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Citizenship:
Between State and Society

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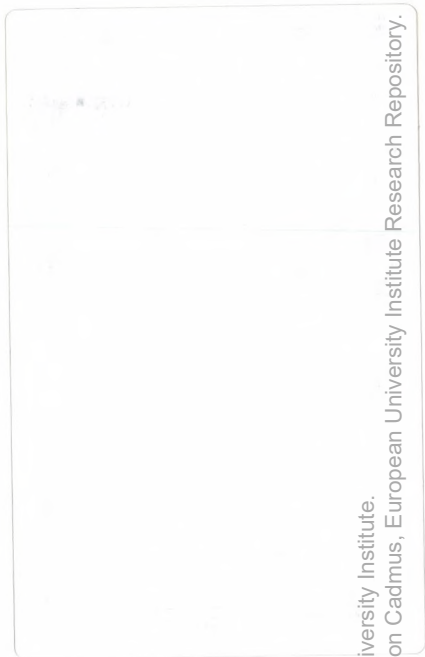
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ROBERT SCHUMAN CENTRE

Citizenship: Between State and Society

GIOVANNA ZINCONE

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Abstract

Marshall believed that citizenship rights offered a good antidote to the inequalities produced by capitalism. This article suggests that we currently need: a) to widen the tasks of citizenship and evaluate it according to its effectiveness as an antidote to the inequalities existing in civil society (for example in gender or ethnic differences), but: b) not to trust citizenship when it is completely disconnected from civil society, as this is likely to lead not only to inequalities, but also differences and limitations to public power. A good citizenship model should come from the organisation of the weaker groups in civil society, deriving from their ability to permeate the state and to take advantage of it (following the emancipatory societal model).

To test this thesis, it is necessary to judge the value of the emancipatory societal model, assessing it on the basis of the quality of the rights it produces. To doing this, we have singled out three key features (extension, incidence and pluralism) of the three types of rights (civil, political and social) which make up citizenship.

We conclude by observing the current transformation in economic forces, including the impact of globalisation, which is eroding the chances of maintaining valid rights for citizens in Europe. The weaker classes in difficulty due to increasing competition within the workforce, both at the domestic and international level; popular suffrage has less importance than previously because of the loss of power of national elective bodies to non-elective technical and supranational ones. All these factors are causing European models to shift towards conservative societalism. Capitalism is revealing itself as a good antidote to citizenship.

The Key Issues

As is well known, it was Thomas Marshall who invented the concept of citizenship. The English sociologist was the first to point out, in 1949, that citizens of contemporary states are provided not only with a certain number of political and civil rights, but also social ones. He introduced, in this way, a political interpretation of citizenship, as distinct from the judicial one, which distinguishes the citizen from the foreigner.

Marshall claimed that in contemporary political systems to be a citizen, in the judicial sense, also means having access to public protection of one's material wealth, in other words, welfare. In fact, we should add – an aspect which Marshall failed to note – that foreigners too may be entitled to many rights if they reside in a country. Marshall therefore identified an important phenomenon, but did not provide a reply to three crucial questions. What distinguishes the different models of citizenship? Can we say that some models do their job better than others? What is their future? However, in inviting us to consider citizenship as *antidote* to inequalities produced by the market, Marshall made a point that is useful in attempting to answer these three questions. We could evaluate the various models measuring them in terms of their effectiveness in counterbalancing the effects of the market.

Since Marshall, the concept of citizenship has also been used to assess the public treatment of gender differences and ethnic minorities. Today, as a result, we have to widen the spectrum of our evaluation, judging citizenship as a tool for opposing not only class inequalities, but all social privileges. This means we need to focus attention on the relationship between citizenship and society, as well as the relationship between citizenship and the market. For the same reason, we cannot limit ourselves to examining the welfare protection that citizenship rights can offer, but have to bear in mind their capacity to safeguard the dignity of social groups and to empower the weaker categories.

Understood in this way, citizenship rights are a means of emancipating people and groups from their position in civil society, from prejudice and from closures, by giving them the same power and the same dignity through public action. According to this definition, citizenship should be a publicly provided good, to protect people against the inequalities of society. But past and modern Jacobine experience has taught that, when completely stripped of social resources, power and identity, citizens risk remaining with no defence even against public action. We therefore need to question the vitality and also the desirability of citizenship models which have no roots at all in civil society. At the same time, citizenship would fail as an emancipatory tool if it were not able to counteract social privileges and prejudices. This means that we are asking

citizenship to accomplish the difficult task not only of protecting collective identities and respecting autonomies, but also attacking privilege and fighting prejudice. This kind of citizenship, which has to be built *between* state and society, without leaning too much one way or the other, is inevitably precarious and at times contradictory.

But, can we demonstrate that a satisfactory form of citizenship must necessarily be built between society and state? To reply, we first need to define the features of a satisfactory model of citizenship. To measure the effectiveness of the various forms of citizenship (their capacity to *emancipate without imposing new constraints*), we have to single out the main desirable dimensions of political, civil and social rights that citizenship can provide. I suggest that in relation to political rights we should consider three dimensions: (1) *the extension-equality* of the vote, i.e. the extension of suffrage, equality of active and passive votes, and so on; (2) *the incidence-weight* of the vote, i.e. the relative importance of the institutions voted for and of elective bodies as opposed to non-elective bodies, e.g. the relevance of Parliament and other elective bodies in comparison to technical bodies existing at the national and international level. Furthermore, we should consider whether the visible decisions that the voters can control are as important as non visible decisions, secret agreements and intrigues, since when democracy is not transparent, the vote has limited relevance; (3) *the pluralism-competitiveness* of the “products” voted for, i.e. the range of legitimate political offer within which the elector can choose freely. It is obvious that a one-party system offers little choice, but a system where voters have to choose between parties with almost identical programmes and indistinguishable ethical behaviour also presents a menu of limited variety.

We can attempt to “score” the different models through a series of questions which serve as a basis for empirical research. How many people have political rights? Do they all have the same rights? Until when was the plural vote allowed, i.e. the possibility for privileged categories of electors to make use of a number of votes? Is the proportion between electors and elected representatives the same over the whole country, i.e. is the representative percentage of different areas and regions constant, or are there some privileged areas where a small number of electors have a large number of representatives? Is the proportion between electors and elected representatives the same for all parties, i.e. are there some parties (e.g. the small ones) which cannot be represented because they do not reach the required quota or minimum share of votes, are there voters who have to “pay” their representatives more votes than those voting for larger or geographically more concentrated parties? In other words, to what extent is the system truly proportional? How radical or extremist are the parties accepted for election, are certain types of party banned? How wide is the spectrum of

proposals contained in the parties' programmes? Are the policies adopted by the majority and those proposed by the opposition real alternatives? How strong is the impact on decision-making processes of agreements not exposed to the vote or even the knowledge of voters?

As far as social rights are concerned, I suggest three features are considered: (1) *extension-redistribution*, the percentage of people who benefit from state social security and education programmes, the equality of these rights, or the extent to which they compensate for inequalities due to place, occupation, gender, culture or religion, i.e. the capacity to reinforce or to contrast social inequality. If we wish to evaluate the emancipatory power of the various citizenship models this dimension must be linked with: (2) the *incidence-impact*, that is the generosity and reliability of the provisions, i.e. the ability of welfare to really provide people with income assurances, services and education when compared with the market, family or other sources of support; (3a) *pluralism-differentiation*, the level of variation of provision by place, occupation, gender, culture and religion, i.e. the culturally diversified character of social rights; and also, (3b) the *autonomy*, strength and degree of independence of organised civil society providers v. public providers, i.e. the extent to which the former are able to procure public funding and avoid control, or at least maintain control of contributions and donations made privately by their subscribers.

We need to be careful not to confuse point 1) with 3a) and 3b). In fact, it is possible to have rights of different relative strength for different social categories, as in corporate models, where diversity strengthens inequality. But, we can also have culturally differentiated rights with the same weight, as in the case of equal public financing for schools for different minorities - in this case diversity respects differences. There may also be rights that are of almost equal weight, but managed by autonomous bodies (for a long time the case for pensions in Scandinavia). It is not always possible to distinguish between (3a) and (3b) when observing empirical cases of transition to citizenship, because in the past autonomy and differentiation tended to coincide: autonomy was a precondition to differentiation. More in general, I do not intend to deal specifically with civil and cultural rights¹, as they are partially included in the second dimension of both political and social rights.

For the sake of completeness, we assess the same three dimensions - extension, incidence and pluralism - in relation to civil rights: (1) *extension-inclusion*, i.e. the number of people, or members of a community, who have

¹ I have dedicated a long article to multiculturalism (Zincone 1998b).

access to full (*pleno jure*) citizenship, and therefore the opportunity to act, be equal in the face of the law and to vote, "independently" of sex, religion, or group of origin. In this field too, the path to citizenship can proceed with long strides or small steps, as for example in the case of the emancipation of women compared with the emancipation of small minority groups. This category of rights has another important dimension: (2) *incidence-liberating* power. As for social rights, civil rights too have a differing ability to free everyday life from need, from market trends and destiny. Their impact can vary enormously - from freeing people of unbearable burdens to removing slight limitations or discrimination. Compare, for example, the consequences of the abolition of slavery with the abolition of professional registers, or the abolition of serfdom with the abrogation of gender discrimination in transmitting citizenship rights to the husband or wife. The impact of the introduction of new civil laws on the lives of those involved can be very different. Civil rights may help people to *leave* their village, corporation, their ancestor's religion or clan without paying an unbearable price - this is the *emancipation* aspect, whose extent and power we try to evaluate. But there are two opposite approaches to diversity: the rights may produce indifference towards social and cultural features, making it possible to forget them, or can allow people to remember them and value them as an inheritance, protecting their *difference*. This is the third dimension (3), *pluralism-difference*. Civil rights can protect minorities against forced deportation, against the destruction of their villages, or forced division, but can also make it possible to conserve ancient customs not accepted by majorities, and can enable closures: linguistically separate parties, strong federalism, and reserved quotas in public bodies.

The dividing line between the three categories of rights - political, social and civil - is arbitrary and often blurred. The extension of the vote to women is both a political right and a civil liberation from prejudice. The freedom given to foreigners to create their own political associations (granted in France only in 1981) is both a civil right of association and a political right of participation. But simply listing the three dimensions already enables us to highlight the "hybrid" character of a desirable form of citizenship.

It is impossible to maximise all the positive features at the same time: for instance, it is difficult to combine high competitiveness and plurality of political parties with the ability to elect a stable government. In fact, a system based on too many quarrelling parties will tend to produce discretionary and changing majorities. Similarly, it is difficult to reconcile the protection of the traditions and roots of social groups with the freedom of the individual to break these bonds. Although it may seem wise to attempt to maximise one single feature of citizenship, it has always proved dangerous. For example, to give priority to the impact of political rights, or the power of electors over any institution or

decision, can make it extremely difficult to protect some spheres from the domination of the majority and, as a consequence, to defend minority rights or human rights in general. The abrogation of the death penalty or the religious freedom of small unaccepted groups would be in danger if left to the discretion of the electorate.

A perfect citizenship model, combining all the desirable features does not exist, but we should not conclude that all forms of citizenship are equally unsatisfactory. There are in reality various combinations which offer citizens “packages” of different degrees of acceptability. Some models in fact have very low levels of desirability but, as we shall see, there was one model which achieved a relatively satisfactory combination of desirable features.

This model is the most modern one, and perhaps for this reason emerges from the comparison better than the others. In fact, I have focused mostly on the past, observing the first buds of citizenship rights appearing in various European countries, not their full flowering. For this reason, the models presented should be seen as prototypes, useful for understanding the more recent versions found in both democratic and authoritarian governments. Although I avoid directly citing the most recent models, some of them appear clearly behind their predecessors.

This essay, based on the past, concludes with a look at the future, providing a tentative reply to the question left unanswered by Marshall. Observing the future leads us to link the political sense of citizenship with the juridical sense. What happens if a significant part of the population of resident foreigners is deprived of certain citizenship rights?

We have said that good citizenship should be balanced between society and state. In order to construct the four prototypes of citizenship, I have therefore made a distinction firstly between state-centred models (more influenced by the state) and society-centred models (more influenced by civil society), and secondly between conservative and emancipating models.

Four Types of Citizenship

The four types of citizenship presented here should be considered ideal-types. I have drawn them from some historical cases in their “genetic” phase of transition from oligarchic and authoritarian regimes to democracy, i.e. the early stages of emergence of citizenship rights. Some of the features singled out still characterise contemporary regimes and can prove helpful in distinguishing not only democratic from non-democratic forms of government, but also different

kinds of democracy.

The first alternative considered is between state and society. In the former ("statist" types), it is the state that tends to give shape to civil society, in the latter ("societal" types), it is civil society that reflects itself on the state. Where and why does one or the other appear? Which factors condition the emergence of one model rather than another? It is the level of conflict and competition that explains the insurgence of the different types.

Statist types are generally a response to situations of strong conflict between strong actors, both at the national and international level, in the political and economical field, and in groups with different traditions and culture. Societal systems, on the other hand, tend to be a response to conditions of weak conflict and competition, or conflicts between highly unbalanced forces where the antagonists are not in a position to do any harm, or else conditions of such well balanced conflict that, after many hard-fought attempts, the rivals decide on a strategic agreement. There are no reasons for violent conflict because the strength of the contenders is too unequal (the result is so predictable that there is no point in expending effort in fighting) or because it is too well-balanced (the result is too unpredictable and expensive).

The coalitions in power in societal models are broad and safe enough not to feel they need massive state intervention to survive. The national economies are competitive enough to be successful without state protection, and the dominant cultures impose themselves as a result of their hegemonic strength, either because they are convincing, even to outsiders, or because other cultures are too weak even to attempt to oppose them. Power relations are already satisfactorily established in civil society and the market, so there is no need for state intervention.

The other dimension I use for my typology - following Marshall's implicit suggestion - is that which underlies the ability of citizenship to emancipate new ranks, groups and categories. In fact, paradoxically, new citizenship rights may be introduced with the aim of maintaining old social and political balances. For this reason, we have to distinguish between *emancipating* and *conservative* models. In previous studies (1989, 1992), I have already tried to identify the factors that could possibly have an influence on the emergence of different citizenship models. I now represent them in a revised form.

1) Level and Form of Domestic Political Conflict.

1a) The *ideological distance* between the actors, the degree to which their respective interests can be reconciled, their power relations and 1b) the *degree*

of fragmentation, the number of relevant actors - this is related to the solution of previous conflicts, such as those between Church and State or between different language and ethnic groups². Low levels of conflict and the absence of cleavages or lines of cultural resistance able to effectively counteract state action make repressive action and a strong central state less necessary.

Low conflictuality may also result from the fragile nature of culturally or politically radical groups, or the presence of hostile but apathetic or disorganised groups. Persistent conflict with a strong and well organised actor, such as the Church, justifies state intervention, although this may have more or less effect, according to the power relations in the country. On the other hand, a situation of social balance between linguistic and religious minorities, or repeated fights without a clear winner, can lead to "consociational" solutions, or a partition of the state and self-determination or autonomy of the groups also at a local level, i.e. solutions which are more societal than statist. Balanced cultural fragmentation gives way to a subtype of societal model, where the state is shaped by a society already solidly organised in groups, based not only on class divisions, but also on linguistic and religious ones.

2) Level of Economic Competition.

2a) The *degree of exposure* of the most important sectors of economy to foreign competition. 2b) The *degree of competitiveness* of the most important sectors of economy. What matters is not only the strength of industry in the international market (therefore requiring less state protection), but the relative weight of industry in comparison, for example, to agriculture and the competitiveness of the latter. For the same reason, the possibility of exporting raw materials to counterbalance weaknesses in industry is important.

The same applies in the analysis of the present: it is necessary to look at the exposure and competitiveness of the main sectors of the national economy. The exposure of contemporary economies is greater with respect to the cases which I have analysed, and also in comparison with the times in which Marshall was writing. Functions which were previously linked to the land are now mobile and can be moved abroad. This is true not only for services to industry, such as accounting and promotion, but industrial production too which, due to the low costs of transportation and persisting high wage differentials are often being relocated in other parts of the world. In brief, it is necessary to analyse the degree of openness (dependence on international business and finance) and the degree

² Rokkan (1973) would say the number and intensity of the cleavages at the beginning of the process of extension of citizenship and during its course. Sartori (1976) would speak about pluralism (number of actors) and polarisation (strength of the extreme wings).

of global competition of the economy.

An economy which is both too exposed and not competitive enough requires state intervention to take off and be successful. But the loss of competitiveness does not necessarily induce greater statism. In this case, it is the cultural features and political choices which are important. One can choose to reduce the cost and the protection of labour, as conservative majorities did in the eighties. The arrival of centre-left majorities on the political scene in the major European countries at the end of the nineties has brought back into fashion the use of public investment or reduction in the cost of money to stimulate the economy. Ideologies can orient policies towards protectionism and public intervention or the decrease of guarantees for workers, but transformations in the form of international economical competition represent a constraint for decision-makers.

3) *Level of International Conflict.*

3a) The presence or not of a *state of war*. 3b) The degree of *international tension* for the control of certain areas of influence or resources. A state of war or high tension tends to make systems shift to statist models, and the emphasis on external fractures or cleavages reduces or represses internal cleavages. This leads to strong limits on the acceptance of pluralism, even by societarian regimes, and obliges decision-making power to be organised centrally and vertically. The decisions of the central executive power are transmitted to the other central powers (Parliament and Magistracy) and to local administrations in a rigid way (*rigid transmission rules*).

3c) A statist imprint can come to the system from the *coincidence of the beginning of citizenship rights and national unification obtained through war*. The difficulties of state and nation-building and the frequency of war depend on the geopolitical position of the country concerned (Rokkan 1970, 1975; Tilly 1975, 1981, 1990).

Because of the need of the state to support war industry, conditions of war tend to lead to even more protection of the national economy than the economic factors cited above. The creation of a more competitive modern army may also be an important cause of statism (Ralston, 1990), but this depends on the context. Roosevelt, for instance, paid for the agreement of the conservatives to enter the war with concessions to reduction in welfare. In this case, entry into war had to be negotiated with important economic groups rather than the soldiers who were sent to the Front. American participation involved more economic investment and expense than human investment. In fact the army was made up of volunteers, at least at the beginning of the First and the Second

World Wars. The absence of a conscript army is a typical societal feature.

4) *Breadth and Power of Dominant Coalitions.*

4a) The presence or not of a *hegemonic, pluralist and inclusive coalition*. The feature of this type of coalition is an alliance between social classes and/or political actors which is so strong that it does not need to use repressive measures against adversaries and is able to display pluralistic and inclusive behaviour towards social and political opponents. This syndrome contrasts with the presence of non-hegemonic coalitions, which are sectarian and exclusive, needing to use state action to impose themselves and maintain order. Up to now, this variable is similar to that cited in point (1): a strong hegemony feeds on cohesion, and produces a low rate of conflict. 4b) *whether or not new actors are included in the winning coalitions, and the characteristics (dominant or subordinate) of new actors within the winning coalitions*. The emancipating rather than conservative nature of societal or statist strategies depends on the role played by the emerging classes and political actors, i.e. whether the coalition they are part of is winning or losing, and whether their presence inside the winning coalition is dominant or subordinate. When they are losing or are subordinate, we find conservative models - those which involve new actors in the political system (otherwise we could not detect the incipience of citizenship), but keep them in a subordinate condition.

5) *Culture of the Ruling Elite and Conception of Citizenship.*

5a) The *criteria for legitimating power and citizenship*. Here we may have, on the one hand, the conviction that the power of the prince is based on divine investiture or that the charismatic leadership of a chief is due to a natural and special bond that links him to his people. On the other, there is the argument for political representation based on ability or on social eminence, or the belief that popular sovereignty should be the only source of legitimate power. The former interpretation (investiture, charisma) supports the statist and stabiliser models, as these are able to justify the autonomy of public power from civil society. Their modern versions are the arguments in favour of stable executive powers, removed from stormy public opinion and the intemperance of the electorate - the idea that important decisions should be taken by technical bodies which are not politically influenced by the representatives elected by the people. A screen between state and civil society, between the public and social arena, may also consist, especially in countries of immigration, of ethnic concepts of citizenship in the judicial sense. One becomes a citizen, a member of a community, not because one lives, acts, works or studies there, but because it is the place where one's ancestors were born. In this way, citizenship is detached from social reality and linked - like divine investiture and the monarchy - to abstract

principles. A non-societal concept of citizenship is typical of German law which, until very recently, refused to accept as citizens the sons or even the grandchildren of immigrants born and bred in the country, but automatically gave that precious status to people who had a German ancestor, even if they themselves were born and bred outside Germany.

The privilege given to the *jus sanguinis* follows an anti-societal logic. This can reach extreme consequences when people who have lived for centuries in a country and communities who have contributed considerably to the wealth and cultural richness of that country are deprived of certain civil and political rights - including citizenship or even life itself - only because they are part of a religious or cultural minority, despite the fact that they may have already abandoned it as individuals. This was the case of the Holocaust.

The criteria of legitimisation of power, representation and citizenship - in a juridical sense - can reinforce the societal conservative model, but only when it affects a single part of society which is considered worth admitting to the community or representing in government. In this way, when we establish that the granting of a residence permit depends on having a regular job (when it is well known that most immigrants work in the informal economy), we are not behaving so differently from those liberal regimes which allowed the vote only to stable workers, and disenfranchised vagrants and temporary workers. Fully accepted popular sovereignty - as the equal sovereignty of disparate needs and opinions, and the acceptance of change in the composition of the "sovereign people", such as that caused by the permanent settlement of waves of immigrants - supports the emancipating societal model.

By contrast, sovereignty may be offered to some people, i.e. to the non established or non wealthy classes, but exclude the unqualified or those considered incapable of correctly understanding their own "real" needs and those of the country (those whose views on public good do not coincide with the views of the ruling élite). This interpretation justifies emancipatory statism in its more authoritarian versions. Reactionary or revisionist citizens become "foreigners", deprived of their citizenship rights, imprisoned, deported or killed. Its contemporary version, which is softer and more democratic, works through assimilation. Only those foreigners who conform to the culture of the receiving country, who understand and accept its superior modernity, are entitled to become citizens.

5b) *The ways of reaching optimal social and economical order - through spontaneous processes or agreements among social groups, or through state intervention directed by the enlightened élite.* In the conservative societal models, the task of the law consists mainly of the registration of customs and

conventions already accepted in civil society. In state-centred models, on the other hand, it originates from an innovative volition³. What changes is *the role assigned to the state*, not only in the guidance of the economy, but also in the ethical education of citizens. Hence the educational value of a conscript army and state schools. Not only the means, but also the desirable targets are different. 5c). *The configuration of the optimal social order*: the acceptance, also in a democratic context, of the role of the traditional élite, of the great families, the favour accorded to co-operation among the various components of society, the tendency towards equality and the dismantling of hierarchies and assignment of social roles through birth.

I realise that, in explaining the different citizenship models as a set of dependent variables, I am using the political culture of the political actors as an independent variable, capable of influencing the actors' strategy and consequent "production" of citizenship rights. I am assuming as a limit to the action something which could be considered its very engine. I could have considered the culture as the original project of the political action, and the other variables as constraints⁴. I prefer to consider culture too as a limit to political action, whose specific aim is the occupation of the places where decisions are taken, the so-called "decision-making arenas". The factors listed influence, but do not determine behaviour, because I postulate that the political actor acts with a certain initiative and autonomy towards the constraints he or she has to deal with⁵.

I therefore propose we represent the strategies which produce citizenship through the action of the ruling élite (defined as the internal élite) or the action of a decision-making élite excluded from power (defined as the external élite) as "reasonable" political actions. As political actions, their characteristic aim is to maximise their control of decision-making bodies, minimising the cost of power sharing with others. To do this, and reduce the competitiveness of rivals, the élite in power can use repressive measures or, as an alternative, can modify the rules of the game, e.g. change the requirements for taking part in or setting up decision-making bodies, the responsibilities of these bodies and their mutual relations. By modifying the qualifications for becoming an elector rather than a Member of Parliament, or modifying the powers of Parliament rather than the

³ Catalaxis in opposition to extension of costructivism (Hayek 1973-1979).

⁴ In the fourth chapter of my book *Da sudditi a cittadini* (1992) I follow the statist transformations of the liberal-social institutional project of the unitarian leading class under pressure from hostile factors and the need to stay in power.

⁵ On the opportunity to give an explanatory rule to the ability of leadership to guide the processes of democratic modernisation see Linz and Stepan (1986).

courts, the extension and impact of political rights are modified⁶. This is done with the aim of over-representing the components which are loyal to the political élite and under-representing the others.

We call the rules that transform political preferences into requirements to access to the vote or representation the *rules of translation*. These govern not only the extension of the vote and the equality of opportunity of voters, but also pluralism. For example, a minimum quota of 5%, which excludes from representation parties which do not reach this limit, may be introduced with the justification that it eliminates very small parties and makes the creation of government majorities easier and more stable. But it is clear that this also limits the extension of the vote, because people who vote for small parties count as non voters. At the same time, this measure can be useful for eliminating unpleasant extremist parties or suffocating at birth rival parties which could become dangerous in the future. In this way, pluralism too is limited. The rules of the political game may also be modified with the aim of giving weight to bodies in which the rulers' policies are better represented and reducing the power of the others, by giving greater importance to the decisions of the former than the latter (e.g. the decisions of the former are transmitted to the latter in a stricter form). We call these rules *transmission rules*. The control of the central executive over local bodies makes their vote less incisive. For example, it can reduce the significance of the immigrant vote by ensuring that, even when it exists, it is limited to the local administration. Considering that immigrants normally prefer left wing parties, the loss of significance of their vote could also be seen as a move against pluralism. If we hypothesise that the rules of the game and citizenship rights that follow can be aimed at altering the political competition in favour of some groups and the detriment of others, *their first target is pluralism*.

Does the form of political rights therefore depend on the needs of the ruling élite? In contrast to this thesis, put forward by Rokkan and Bendix, and formerly by Mosca, I would suggest that there is often in fact a situation of competition *between* élites. In fact, the political game is not always in the hands of the ruling élite or majority, and these are not always cohesive. The changing of the rules is not only the effect of adaptive behaviour of the political class towards the environment. The rules of the game (and the citizenship rights they reflect) can be completely overthrown by an external élite, as demonstrated by the history of successful revolutions. They can also be renegotiated between the

⁶ It is a thesis that Rokkan too sustains in a less radical way (1970, 31) when he affirms that "The decision to extend suffrage has never been an answer to pressure from below: it has often been the result of a struggle for the influence at the top or movements attempting to enlarge the basis of integrated national power".

(internal and external) components of the ruling classes, as demonstrated by the reformist evolutions (the emancipating and conservative societal models).

We can define as “internal” and “external” those élites which respectively control and do not control the decisional areas. But we should add that this distinction is not based on a clear dichotomy, as there are various degrees of exclusion from power. One thing is an opposition party, however radical, another is an illegal party which does not even recognise the rules of the state and is not recognised by them⁷. The political classes, both internal and external to the decisional bodies, compete (with each other and internally) to achieve favourable rules of the game (e.g. the access and form of crucial decision-making bodies, so that they can maximise their own presence in influential bodies, or give greater influence to bodies where they hold more power).

Nevertheless, favourable rules of the game and an appropriate form of political rights are not on their own enough for any élite, because power cannot be based only on an artificially constructed consensus. Not even an authoritarian government is completely free from the need for real consensus. The élite will therefore try to acquire sufficient support, and will do this through the management of social rights and through public propaganda. So social rights can consist of rights for citizens, but also be used as a means of manipulation for keeping them in subjection.

Social rights may be desired as a basis for fair *translation rules*, i.e. rules which reflect the actual political preferences of the citizens, since they help for example to substantiate the extension and equality of the vote, or because they allow the potential elector to become competent through a good education and independent from employees through economical security. This interpretation of social rights as necessary support to political rights is strong in liberal democratic thought. It is sufficient to recall Stuart Mill (1975/I ed. 1861), who saw public education as a way emancipating the working class from the cultural poverty which made them politically incompetent.

But social rights can also be desired as support for strict *transmission rules* which transfer decisions from centre to periphery, and from above to below. Education itself constitutes an ideological instrument in the service of those in government, especially in authoritarian regimes, but also to some extent in democratic systems, where the values of the majority culture are transmitted through school as neutral values. Welfare can also be used as means of corruption and manipulation of the electorate and of dissenters. The subsidy of

⁷ Dahl (1966) teaches us this when he classifies the oppositions, or Rokkan (1970) when he observes the various inclusion thresholds.

associations, and the delegation of certain assistance functions to the third sector are ways of rewarding loyal groups, but also of making some originally dissident groups economically dependent (Ergas, 1986).

On the whole, citizenship rights are the result of competition between political élites, who take rational strategic actions intended to maximise their power base, though subject to constraints and pressures which depend on the specific situation, including current values and principles. We may define this action as “reasonable”. I shall now focus on the features of the two conservative models, which correspond respectively to the cases of Germany and Great Britain.

Conservative Models

The State-centred Conservative Model

First of all, I shall summarise the nature of the social and political rights in this model in relation to the three characteristics: extension, pluralism and incidence. In the German prototype (and the similar Austrian case) we find: an early introduction of the welfare state through the first system of compulsory insurance. Thus there was, for those times, a relatively wide range of generous social rights (incidence), extended to a fair number of people (extension). Social rights were diversified, but the providers had to accept strong state control. In this respect pluralism was limited, especially in relation to its autonomy.

As far as political rights are concerned, we observe an early extension of suffrage (in Prussia it was universal from 1867 and in the Reich from 1871) with a good level of extension, even though in Prussia a strong inequality of suffrage persisted due to representation by orders. The secret ballot fostered the constitution of opposition parties, but although formally there was strong pluralism, the oppositions were subject to police control and, at times, even repressive action, as they were radical.

The weakest point of this citizenship model is the low impact of political rights: neither the executive power, the government, the Prime Minister nor the Chancellor were responsible to the Parliament, and hence to the electors, but were nominated by the Crown, i.e. the Emperor. Weber decidedly deplored this form of bureaucratic government, because of its inability to innovate and adapt to the social change, due to its distance from an enterprise logic.

Internal cohesion and national unity was also imposed through an expansionist foreign policy. Coincident timing between the construction of the

nation and the rise of citizenship rights allowed a sort of trade-off between nationalism and liberalism, and between state and society, which was destined to last. Similar strategies towards disloyal organisations were in fact to be repeated in the future.

Bismarck adopted a strategy of *direct incorporation* that was intended to break or force into submission the “mass containers”, the new socialist and Catholic political organisations, and to directly address the working classes. To achieve this, he repressed political organisations and obliged social organisations to reorganise under state control, thus representing a first example of neo-corporatist state. “The first social security schemes introduced by Bismarck in Germany and by Taaffe in Austria during the 1880s succeeded in achieving the desired outcome of replacing forms of self-organisation at company level or at trade level with agencies controlled by the state, that kept just some autonomy” (Bauböck 1991, 16). In Bismarckian Germany, as elsewhere, the state had to stop where organised society drew the limits, i.e. where it found “obstacles to penetration” (Flora 1981). Unions were able to resist and to keep some autonomy. For example, they opposed welfare schemes, because they thought they were under-represented in the system that administered them (Lidtke 1966, ch. 6).

Social rights financed by the state were used as a device to draw consent from the emerging working class organisations and to achieve political control of organised civil society. In fact, it is risky to leave the management of welfare to social groups which do not identify with the state and which have a low degree of loyalty. Welfare providers were destined to control huge savings and financial resources, which enabled them to secure people’s consent. It was thus unwise to assign this role to unreliable partners. Bismarck himself summed up this attitude neatly when he said, referring to the socialists: “If you don’t want chicks, you must break the eggs” (Eyck 1950, 294). Even the short colonial German domination followed a very repressive strategy which rewarded subjects only with greater administrative efficiency.

The logic of expropriating opponents’ assets was also very evident in Italy during the liberal period after unification. The 1890 Law concerning the *Opere Pie* (the association of Catholic charity institutions) removed social assistance from Church control. These institutions’ property and money were taken by the State, and clergymen “whose jurisdiction was over people’s souls” were prevented from managing public charity institutions.

The strategy of destroying an adversary’s organisation, taking its resources and using them to try to convert the believers by is quite common, especially in relation to the Church, but it has often also been applied to socialist

organisations. Thus the beginning of social legislation in Germany, going back to 1883 (the state funding of health insurance), was preceded by the severe Falk laws, which aimed to bring the Catholic Church under State control (1875-1876), and by the anti-socialist laws (1878), that repressed the left wing working organisations. In Germany, as in Italy, anti-Catholic stances were soon abandoned to form a common front against the "red menace". But again, as in Italy, none of these repressions was really successful - none of them destroyed the anti-regime movements, but they did have a useful function in teaching these to become more cautious and flexible in the future!

The policy of enhancing national power had the effect of strengthening state identity versus social identities (class, religion, language, region and so on). This last aspect of the strategy - aimed at reducing the strength and complexity of civil society - was reinforced by the strong role assigned to the Crown as a constitutionally impartial body.

We cannot define this strategy exactly as reactionary. In fact, it attacked on two fronts at the same time: the socialist and the very traditionalist one. It could count on the support of the liberal nationalist centre and of moderate conservative groups, such as the Bismarckian block. (Crispi's alliances and strategies in Italy at that time were very similar.) It was not a pluralist model in the British sense, neither was it an authoritarian state on the Asian model (Bendix 1964; Marletti 1987), but a truly conservative state centred model. On account of the pattern of social relations, the leading role assigned to the agrarian sector and the decision-making role of the bureaucracy as opposed to elected politicians (Weber 1922), we can define it a state-centred conservative model with an authoritarian tinge. This is also because of its cultural basis, the primacy assigned to the state over civil society, and to monocratic bodies over pluralistic and elective ones.

The conservative and state-centred model tends to combine state privileges (take for instance the special social provisions assigned to civil servants) with social privileges (for landowners and important entrepreneurs) and tends to set up state-owned companies in order to counterbalance the power of private companies, when these are not considered loyal to the regime. But what form of the variables identified above helps to foster a conservative statist citizenship model?

1) Level and Form of Domestic Political Conflict.

In this model, in countries where there is still a strong catholic presence, we have a persistent conflict between the Church and the State. This conflict cuts across and breaks the potentially wider government coalitions, based on class

belonging, and produces coalitions which are constantly "under siege". The birth and expansion of the socialist party, earlier here (in Germany it was in 1878) and its anti-system nature increased the internal conflict in the country.

2) *Level of Economic Competition.*

These systems are always in competition, because they belong to the second phase of industrialisation. There is state engagement in the economy, both through protectionist measures, and direct intervention in the national economy, of which welfare policies represent only a part. It is necessary to add that, unlike Italy, these economies were "up and running", as they had to be wealthy enough to be able to extract funds for the *Sozialstaat* and advanced enough, under the administrative point of view, to impose taxation and provide services. Italy did not meet these requirements when a statist strategy of direct incorporation was tried by Francesco Crispi, an admirer of Bismarck. Economic backwardness and administrative inefficiency help to explain the reluctance of the young Italian State to introduce social security (Paci 1984). The institutional conservatism, about which we will say more when analysing the cultural variables, and the need to establish a more competitive economy, led to an excessive exploitation of the workforce (Rokkan 1970), and favoured the rise of anti-system opposition. When the internal élite closes up, the external élite cannot remain open either. The radical attitude of external élite in Germany was due non only to the attitude of its counterpart, but also to the *timing* of the birth of a national working class party. The countries which were latecomer in this respect tend to have more radical workers' associations which are not in tune with the context, since their demands are imitated from the countries with more advanced economies. In the less advanced countries, labour productivity must be kept high in order to catch up with the leading economies, therefore demands that would raise the cost of labour are unlikely to be accepted. In this situation, protests are easily channelled into strongly antagonistic, anti-system organisations⁸. It then becomes necessary to reaffirm the authority of the state or crown, to attempt to destroy the unloyal mass organisations and buy the consensus of their members⁹.

⁸ These countries are often latecomers not only economically but politically too, so their regimes have not yet overcome the legitimisation crisis. This allows the spread of an opposition culture that wants to overthrow the government.

⁹ These are situations and strategic moves that often occur in emergent stages of the working mass movements. In some countries, the containment strategies take on softer forms: the repressive strategy is entirely or partially replaced by the authoritative paternalism of the conservative mass parties. This is the case of the promoters of social monarchy, the *Tory* movement which in Italy finds Sidney Sonnino as is the most important supporter. The Bismarckian version is certainly more authoritative than the English one. The fact is that the conservative Sonnino and democraticist Crispi would agree about a policy very similar to the proposed German model.

3) *Level of International Conflict.*

While the construction of national unity is achieved by conquest or as a result of a hostile international climate, authoritarian or statist features tend to be imposed from the beginning. An example is offered by the behaviour of the German liberals, who renounced the parliamentary principle desired for the new regime in order to offer a compact front against the forces hostile to national unification in the Frankfurt Diet (1848). Germany was unified through three wars: the first in 1864 against Denmark, the second in 1866 against Austria and the third in 1870 against France. Italian liberals and democrats, too, adapted their institutional ideals in order to make unification possible in a hostile environment, but conceded less than the Germans to authoritarian statism. The exaltation of national unity and pressure on industry coexist in wartime. It is not a coincidence that the uniformity of political rights (extension of suffrage) and relative uniformity of social rights (first compulsory and subsidised insurance, then national insurance) tend to be introduced after or during periods of conflict (Middlemas, 1979, Therborn, 1977). These concessions are also useful to compensate citizens for the personal risks and difficulties implied by the state of war and to prevent mass desertion. Bismarck considered universal suffrage to be "a weapon in the battle against Austria and the other foreign countries" (Therborn 1977, 22).

4) *Breadth and Power of Dominant Coalitions.*

The bilateral opposition from the Catholic *Zentrum*, on the one side, and the socialists, on the other, weakened the internal élite, de-legitimising it as a coalition. Religious cleavage broke both upper and lower class alignments and prevented any kind of hegemonic coalition. The weakness of coalitions explains statism, i.e. the need to make use of the strength of the state to enforce power. The social coalition that supports the regime was dominated by land-owners, which explains the conservative nature of German statism.

5) *Culture of Ruling Elite and Conception of Citizenship.*

In the German political culture, traditional sources of power legitimisation were abandoned later than elsewhere. By contrast, the conception of a State which has leading functions in relation to civil society came earlier. These principles were synergetic. The central role of the Crown, its hereditary character and the principle of divine investiture, according to which the Kaiser derived his power from God and not from man, emancipated public hierarchies from civil society. The hegelian conception of the state and the public arena as spheres which produce a superior ethic, detached from the petty individual, familial or corporate interests, plays the same role of protecting the State from the influence

of civil society.

The State and the public sphere were places where women could not enter. It was held that the emotionally-involved, family-focused woman would never be able to transcend her private life, to deserve the membership of a superior order, and would never be a citizen. In conservative thought, the paternal state reflects the virtues of the family, where hierarchies are respected, quarrels banned, for the sake of achieving the common good. Conservative statism invades and transcends the family - those who remain in its web are limited to an inferior spiritual and political level. We only have to think of the hegelian view of the constitutional state and the influence this had on later public rights in Germany: on the one hand, the dislike for particularism, for the late feudalism that the parliamentary structure was supposed to represent; and on the other, the task of creating order in civil society, given to the state, and the definition of its bureaucrats as a "universal class". Society was not supposed to be pluralist, but organic, the parts had to co-operate and overcome partiality in the name of the general interest, represented only by the state. For Hegel, state and government should absorb and raise to their highest level the principle of the family: "the same unity, which bonds the family with a sentiment of love, is the essence of the State (...). The living totality, the conservation, so to say, the continuous production of the State in general is the *government*. The necessary organization at the natural level is given by the coming up of the *family* and of the civil society. The government is the *general* part of the community, the part which has as intentional aim the preservation of other parts, and which both conceives and applies the universal aims of the whole (Hegel, 1878, II, 403 and 409). From this, it followed that women, being absorbed in the natural organisation (the "family"), would not be able to rise to the public sphere when this meant leaving behind those predilections and affections which could distract from the search for the general interest. As Carla Lonzi effectively observed about Hegel, he rationalised, more insidiously than others, about patriarchal power in the dialectic between a divine female principle and a human male principle. The former shapes the family, the latter the community:

"As the community gives itself its means of existence through the destruction of family bliss and the dissolution of individual self-consciousness in the universal self-consciousness, it identifies as its internal enemy that which is at the same time necessary and oppressive: femininity in general. Woman does not invade the subjective level: identifying herself in the family, in relatives and in blood ties (...), she lacks the conditions to emancipate herself from the family ethos and rejoin the self-conscious form of universality through which man becomes citizen."

After this long citation from Hegel, Lonzi comments:

"The feminine condition which is the result of the oppression, is indicated by Hegel as the very reason of the oppression" (Lonzi, 1970, 25).

From this theoretical premise, according to which women were supposed to be absorbed in the family, comes the legal measures which tied women to the family and ensured the division of roles was fully respected. And this was true not only for the pre-liberal authoritarian regimes, but also for the post-liberal, fascist regime, where the woman was relegated to her duties and male predominance in the family restored. Even today, countries with a statist matrix (France and Germany) tend to protect maternity more than the countries of conservative societal origin, but they also tend to consider fathers as responsible for their children and entitled to family allowances (Wennemo 1994).

Hegel's conception of the State – as correctly observed by Sabine (1964) – closely fits a form of nationalism in which it is a function of the state to foster industry and trade as part of its general mission to extend the national power. It was in Germany that the main school of criticism of the market economy, the institutional economy, was born. In the statist syndrome, cultural variables combine with economic variables. In Italy, it is in fact in the areas with the least advanced economies and civil context, the Southern regions, that hegelian philosophy flourishes (Romanelli, 1979). Politicians of southern origin, like Crispi, were the ones who fostered some kind of statist model, and who ended up by applying a *direct integration* strategy, i.e. a little welfare and the repression of the opposition. Furthermore, the external élite's culture oscillated, in Italy as well as in Germany, between theoretical revolutionarism, which relegated it to the role of an anti-system force, and accommodating behaviour which reduced the efficacy of its subversive power (Salvadori 1981, 3-48). Legien's unionist reformist model was, as we shall see, to find a more coherent application in the Swedish case than in its native Germany.

The German conception of citizenship is typical of a "nation in search of a state". It grew up alongside the movements for unification and has gradually gathered strength. It is an ethnic, *völkish*, conception: being part of the state depends on sharing traditions, of belonging to one people (Brubaker, 1992). Prussia (like Denmark) first adopted a *jus soli* principle for the acquisition of nationality, it introduced *jus sanguinis* in 1843 and reinforced the principle in 1913, when the country perceived itself as a country of emigration. Citizenship by descent became dominant, underlining the country's reluctance to naturalise foreigners, such as immigrants from Poland. Since then, the *jus sanguinis* has persisted even in democratic Germany after the war, and begun to be discussed only in the nineties due to the settlement of immigrants of Turkish origin.

If our general thesis on the statist model is right, this model should be found in contexts of political conflict (not only at internal, but also international conflict), and in weak economies struggling to catch up with stronger ones, or strong economies in recession. In support of this thesis is the fact that economic protectionism and the introduction of social rights appeared in Germany after the first electoral success of the socialists (internal conflict) and the economic crisis in the 1880s (loss of competitiveness) (Leon 1980), and as support in the attempt to catch up with the British economy. If we wish to interpret the Italian case in terms of citizenship typologies, we can consider the liberal phase as a societal project in a context which gradually turned into a more statist model, as the annexations continued towards the South. In general terms, after unification Italy was backward even from a statist point of view – there was a religious cleavage, worsened by the presence on national territory of the hostile Vatican state, and like in Germany, an attempt (though weaker and with a greater delay) to catch up with the first-wave industrialised countries. Finally, there was a young and less efficient bureaucracy.

In the period immediately after unification, the ideology of the liberal élite - mainly from Northern and North Central regions like Piedmont, Lombardy, Emilia Romagna and Tuscany - was essentially societal. Their initial intentions in setting up the institutional profiles of the new state was societal – this clearly emerges when we analyse the bills of law and constitutional projects - but they had to come to terms with a hostile opposition, and were forced to adopt a weak statist model (Zincone 1992, chap. IV).

The Societal Conservative Model.

When we observe an example of the *societal conservative model*, like liberal Great Britain, we notice that the vote expressed by organised civil society gives legitimisation to and actually decides the composition of the main decision-making body (the House of Commons). Even though non-elective bodies - such as the House of Lords and the Crown - still retain certain responsibilities and powers, these were already declining in the liberal period, i.e. the historical case we are taking into consideration. Relative to its time, the political rights impact of this model scores high. To avoid the disruptive consequences of suffrage with high impact, the extension was selected, filtered and diluted through time¹⁰.

¹⁰ In Italy the limited extension of suffrage lowered the impact of the Parliamentary system. Furthermore, the voluntary abstention from the vote of the 'disloyal' Catholic electorate and a share of leftist voters limited the consequences of a high impact. The Liberal élite enjoyed an artificial majority, contributing to the dangerous postponing of the problem of mass integration.

We have defined as *rules of translation* those rules that transform social features (income, gender, education, place) into entitlements to vote and be represented. In societal conservative systems, these rules transform into voters only social strata that have acquired some social dignity and political reliability. In practice, this meant that voters usually made up between one and three per cent of the population (Liberal Britain was a positive exception, reaching eight per cent after the *Reform Act* in 1832). So, a typical feature of these models is the *low extension* of political rights. However, the closer the fit of the case to the model, the *higher the impact*. After the electoral reform of 1867, Disraeli introduced the convention of resigning after losing the elections, without waiting for a vote of no confidence in Parliament. The British Cabinet hence became directly responsible to the electorate. By contrast, in the German prototype, Bismarck did not resign even when he had patently lost Parliament's confidence (Eyck 1950; Gall 1982). The societal conservative model is based on limited extension but high incidence of political rights. Its pluralism also scored quite high, as the competition between parties was relatively fair. This was possible because there were no strong anti-system revolutionary parties or movements. Pluralism was easily achieved between similar creeds and friendly movements.

In this model there was a gradual acceptance of selected groups of civil society¹¹ as full citizens with political rights. Low conflict favoured contractual attitudes and agreements on fundamentals. Elites already in power and those out of power were ready to agree on the exclusion of "inadequate classes and genders". Apart from the Chartist movement, even working class organisations in Britain did not ask for universal suffrage. They shared with the ruling elite a "capacitarian" interpretation of citizenship (Dunbabin 1986, 122) based on the assumption that not everyone is able to be a citizen or elector, and that this ability, or "capacity", should be proved by industrious activity in the economic area. Societal conservative systems usually adopt criteria of wealth (a given level of income, possession of real estate or rented property) or of "merit" (the level of education or kind of profession). Both types of criteria are supposed to reflect independence and competence, indicating the subject's adequacy to enter the public sphere. In this model, also the external élite accepts these principles and is aware of the risk of accepting easily manipulated masses into the public sphere.

¹¹ This type has something in common with that built by Eisenstadt (1965) in which he classifies the countries influenced by the British model, such the United States, the Dominions (Canada, Australia and New Zealand) as countries able to integrate the lower classes before they became politically active. In fact they had solved state-building and the legitimisation crises before mass mobilisation occurred.

Political rights in this model are not bestowed, but given under pressure. Extension of suffrage is due to the mobilisation of the potential beneficiary. This can be considered an indicator of a strong and vital civil society, which is a precondition for the model to rise and become established. Goodhart and Hanbury (1952, 245) referring to the period before the 1832 *Reform Act* wrote: "turmoils were spread in the main cities, the situation in Bristol was dramatic. Political associations and reformers groups activities made it clear that if the bill were not to pass soon, civil war could explode". The situation was very similar in 1867, when, as Harrison remarked (1965, 132), "The presence of the *Reform League* stopped the recurrent trick of withdrawing at the last moment". The fear that the meeting to be held on May 6th in Hyde Park could degenerate was the deterrent that pushed Parliament to decide. This third extension was spurred by the mine workers mobilisation for the vote in Scotland, which led to the 1884 Reform.

But, as Marshall too pointed out, this is not a general pattern. The extension of suffrage is not always a consequence of pressure or moves from below as shown by Italian experience in the last century. In 1869, the Italian Minister of the Interior asked Prefects and Provincial Delegates whether it would be appropriate to extend the right to a local vote. The answer was that it was impossible to register the least interest in voting among the population (Romanelli 1983), even from those already with the right to vote.

The extension of rights resulting from demands or moves from below (on behalf of new citizens or organisations), rather than strategies or moves from above (interested concessions by those in power), constitutes another important distinction between statist and societal models. Even though strategies from above are present in all models, *demands for inclusion are stronger in the societal models*. In these, unlike the statist models, moves from below take the form of requests, as opposed to revolutionary movements.

The input-output mechanism is a good way of representing societal models. The movement for women's suffrage, for instance, are typical of countries with a societal tradition, as well as movements supporting civil and political rights for minorities. By contrast, in countries with a statist tradition, the vote was given to women mainly to swamp the red electorate. The same can be said about the early introduction of universal suffrage, which in these regimes was used to "dilute" the industry workers vote with the vote of the easily manipulated country workers.

The same mechanism is also responsible for producing social rights. In Great Britain the state intervened relatively late in funding welfare programs. The turning point can be traced back to the large vote of confidence given to the

Liberals in 1906 to launch a programme of social security¹². The state contribution to social security (unemployment allowances) dates from the same year.

The demand for rights has a relatively compact and homogeneous character: representatives of the excluded groups tend to accept the rules of the game, both political and social.

Great Britain fits with Marshall's hypothesis also from the point of view of the sequence of introduction of citizenship rights. The extension of an "incisive" vote to industrial workers preceded the construction of the welfare state. The first relevant law, the *National Insurance Act*, providing insurance against unemployment and illness through a triple contribution system came in 1911, the first state contribution for pensions in only 1925. This makes welfare appear as the outcome of the labour party's electoral competition but, as we saw when illustrating the conservative statist model, this thesis does not apply everywhere.

To be more precise, we should not depict the societal situation as hyper-consensual and hyper-articulated. For instance, there is not always a strict correspondence between union demands and social legislation - unions sometimes "resisted" state intervention¹³. But, as demonstrated by Heclo (1974), there was a close relationship between the contents of socialist programmes and the contents of the law, i.e. between articulated requests and concessions. In liberal Great Britain, the classic request-response model is not so far from political reality as elsewhere. For instance, the minority report on the *Poor Law*, presented by the Webbs in 1909, summarised the future programme of British welfare.

The case of liberal Britain fits the societal model well also as far the management of welfare is concerned. Welfare came late, and the extension and incidence of the social rights are low if we compare the country's level of economic development with statist cases. Autonomy and differentiation rates are high, and pluralism is respected both in social and political rights. For similar reasons, oppositions were accepted because they were moderate; welfare and education were the responsibility of civil society organisations because these were loyal to the government. It is important to specify that societal regimes adopt an *indirect form of government* - they do not act directly, but delegate many public functions. This devolution tends to take extreme forms in

¹² After the debated Unemployed Workmen Act of 1905.

¹³ On the origins of the British welfare state and the role played by the organised working class see Bruce (1972), Fraser (1984) and Thane (1986).

education: in fact, for a long time, the English prototype limited its action to the subsidy of religious organisations.

The first law, which granted an endowment of twenty thousand pounds to the two principal school associations - the *National Society* (Church of England) and the *British and Foreign School Society* (non conformist) – dates back to 1833 and took until 1872 for Great Britain to introduce compulsory public education. According to some critics of the British welfare model, the country paid for this delay, resulting from a typical societal attitude, in terms of economic development¹⁴.

It should be pointed out that this delegation of education was made only to the officially accepted, loyal confessions. No Catholic nor Jewish schools were financed, since these religions were considered disloyal and detrimental to liberal regimes; they were “emancipated” and given civil rights only in 1824. Respect for the autonomy of civil society applied to only part of that society: the part that was perceived as homogeneous to the ruling class.

Societal systems can arise in countries where the state is able to disband its prime enemy, Catholic Church, at an early stage. Societal Britain is the only non authoritarian state with its own Church and Monarch to head it. As for education, the management social security too was delegated, in this case to *Friendly Societies*. These mutual help societies covered those in the working class who earned enough to save the money needed to contribute. Autonomy was combined with differentiation, to the detriment of extension and equality. The success of the Friendly Societies, which accumulated an incredible amount of small savings, i.e. their relatively *high incidence*, was due at least in part to fear of the workhouse. But the system adopted in Speenhamland, which had been extended country-wide since 1795 and which guaranteed a minimum living wage (for instance by integrating salaries), was dismantled in 1834 under pressure from free-marketeers and replaced by the *Poor Law*, that allowed the reclusion of the needy in *workhouses*. These were effectively prisons, where the inmates were obliged to wear uniforms, were not allowed to receive visitors, and women were separated from men. As the report of the committee chaired by Bentham stated, “every penny spent to make the situation of a poor person preferable to that of a worker is an incentive to indolence and vice”. People who “enjoyed” public assistance lost their civil and political rights. The law was in force until 1918 in Britain and 1934 in Iceland.

¹⁴ I should like to thank Professor Zeitlin for our conversation on the evolution of the British Welfare State at the London University Institute of Historical Research.

The little public assistance and social citizenship we find in liberal regimes was offered in exchange for political and sometimes even some civil rights. The citizen had to be an economically independent person. In this model, the dependence of citizenship on features and abilities demonstrated at the social level is complete.

Rights were the spontaneous result of natural qualities and endeavour. But we know that liberal regimes cheated, since in order to prove that some groups were not fit for citizenship, they were prevented from entering social competition. Women, for instance, could not show their performance in business or in school, since they did not enjoy legal rights (for example, they could not sign contracts) and were excluded from higher education. In Great Britain, the civil service opened its ranks to women in 1855, but only for the lowest jobs, and not until 1870 were they admitted as employees. Lawyers' and doctors' associations wanted universities to be closed to females, and when women were admitted, they restricted entry to their professional registers. In general, the higher their status, the longer the higher education establishments and professions resisted. English universities began opening their doors to women around the mid century, but Oxford and Cambridge were the last to cede. Even in an area where Britain was a forerunner, the laws for the protection of workers, which forbade women and children to do certain jobs and work long hours, were in one sense a way of limiting unfair competition from cheap labour, avoiding competition with the more valuable work of men and reinforcing the idea that women were not suited to a role in production and, hence, to become citizens. Women could be protected at work because they were not citizens (Marshall, 1990; I ed. 1950, p.15).

The economic independence and political competence which were supposed to distinguish the good liberal citizen were precluded to women on the basis of pre-social considerations, due to their weak physical and intellectual make-up or on the grounds of considerations contrasting with the liberal pluralism. Whereas public order could admit a multiplicity of opinions, economic order could admit competition between producers and workers, family order was based on the dominance of men over women. The acceptance of components which, as Locke states, legitimated liberal institutions, was superfluous in the institution of the family (Schochet 1969, 93). On the contrary, there it was necessary for somebody to rule! As stated by Locke (1948, II, 82, 297): "But the husband and wife, though they have but one concern, yet having different understandings, will unavoidably sometimes have different wills too. It therefore being necessary that the last determination (i.e., the rule) should be placed somewhere, it naturally falls to the man's share, as the abler and stronger part". In this way, the liberal principle which says "all individuals are by nature free and equal between them" is denied because, in the case of women, a

diversity of nature is found, too strong not to be taken into consideration when political rights are decided.

Public culture praised the sphere of production as opposed to the sphere of reproduction, but women were secluded in the reproductive sphere and kept away from productive activity. Even in the reproductive sphere, as in the family in general, women did not have rights: family possessions belonged to men, and in the case of separation, the custody of children was usually granted to the father. Similarly wages, salary and any income of a married woman (even when she was separated) were administered by her husband. Feminine citizenship was an indirect one. As Vogel (1989, 11) observes, quoting Atkins and Hoggett. (1984, ch. 9 and 10): "With regard to nationality, residence, responsibility of the children, taxes, pensions etc., the rights and the duties of a married woman are kept still in the subordinated and defined state of wife. For example, we have to wait till 1898 for the British government to propose a revision of the fiscal laws which treated the married woman as a real estate property of the husband."

Up to recent times, and sometimes even now, conservative societal countries have followed a strategy of supporting "family income" earned by the father (Orloff, 1996 a, b), thus reinforcing the traditional family model in which the father works and earns outside the family and the mother takes care of the family. The commitment to a male breadwinner - and female housewife - has to be considered (Lewis, 1992) a crucial element in distinguishing between conservative and emancipating welfare regimes¹⁵. According to liberal creed, merit should emerge from civil society, project itself on the state and shape it. In fact merit is produced by public action aimed at protecting the groups already dominant, in terms of gender, class, religion and culture.

Summing up, this model gives political rights with high incidence, good pluralism, but a limited extension; and offers social citizenship again with low extension, but with a high level of incisiveness. There is high differentiation of the political offer and autonomy of social rights providers. But competition and incisiveness, diversification and autonomy are reserved for those organizations, classes, cultures and gender which are part of the dominant social coalition. This is why we define this model a "societal conservative" one: it can be very tough on the weak and very soft with the strong. This also applies to contemporary regimes or governmental majorities which are inspired by this model. But, with time, the stronger groups, i.e. those who are included, can become very wide and transform this into an emancipating societal model. I will now illustrate in a

¹⁵ Lewis' criterion was considered insufficient by Orloff (1996a) because he did not consider women outside the family model, for example, their ability to earn a living and maintain children alone.

more systematic way the factors which may help explain the birth of the model.

1) Level and Form of domestic political conflict.

The competition within each élite (internal and external élite) may be greater than the competition between government and opposition, giving place to bipartisan alliances and to quite a low level of political conflict. To some extent, the low political conflict is due to a low level of social conflict: the peaks of fighting occurred previously and were contained by early and effective repression (Moore, 1966; Bendix, 1980). The low level of conflict makes it possible to let opponents gradually enter the decision-making arenas and to delegate some social security and educational tasks to civil society organisations which do not strongly oppose the Government majority, even though they may not back it. An opening towards the opposition implies a willingness to risk: new movements are not repressed, because the ruling élite sees a lack of danger from them (as Bismarck might have put it, the eggs are allowed to open since the new chickens are not foreseen to be dangerous!). But the acceptance of risk is not only because it is seen to be slight. In liberal regimes, as in the later liberal-democrats ones, the alarm caused by conflict, and the consequent repression of the political opposition, is triggered at higher thresholds.

The conservative societal model takes on a specific form in the case of strong cultural and linguistic cleavages which have overcome their "physical fight" phase. It gives way to a societal subtype that we can define *communitarian* or multicultural model. This is the case of the genetic phase in the Netherlands, Switzerland and Belgium. Here we still find a Parliamentary Government in early stages and consequently a high incidence of the political rights that can "control" the government. In Belgium and the Netherlands, though not in Switzerland (Huard, 1986, 291), we also find limited suffrage (so *sometimes* low extension) for longer than in Great Britain. The pluralism rate is high, but the electoral competition is "defensive" (Sani and Sartori, 1982; Koole and van Praag, 1990), i.e. aimed at preserving each cultural reservoir. The electoral results have long been deprived of importance because governments are supported by wide coalitions: losing the elections does not mean a party necessarily loses power if it can rely on sufficient alliances.

For authors such as Lijphart (1984) the most important distinction in contemporary democratic models is between the majority type (where competing parties alternatively make up the government) and the consociative type (where governments include almost all the principal parties). It seems to me, however, that the most important point of distinction is the role attributed to the state as opposed to civil society, and that its "cultural fragmentation" can be usefully taken into consideration to single out a societal subtype.

In Belgium and the Netherlands social security too was introduced late. In the beginning, there was relatively low extension, combined with a good incidence (for those categories which could take advantage of state-funded mutual aid societies). There is also high autonomy and a high differentiation of social rights. In the Netherlands as well as in Belgium, "The sub-cultural segmentation delayed the introduction of the compulsory public security, but solicited instead the public subsidy to the volunteer mutual societies and to the sub-cultural assistance structures" (Ferrera 1993, 144).

The introduction of a liberal regime is extremely difficult in a context of really high conflict, of high polarization. This was the case in Italy, where practically none of the environmental conditions favorable to a societal model were present, apart from the will and the culture of the ruling liberal élites, who were in fact obliged to revise their plans, introducing heavy elements of statalism (Zincone, 1992, ch. IV). The Italian case remains one of weak statalism, because it is driven by circumstances, and (even more than Germany) opposed by the presence of the Catholic Church and its organizations in civil society. In fact, the two following extreme conservative statist models, Italian Fascism and German Nazism, had very different relations with the Church. The Italian *Concordato* gave a special status to the Church and a certain degree of autonomy to its organisations.

2) Level of Economical Competition.

Social and political contractualism is also rooted in the economic sphere. Both the societal and the private path to welfare, as well as the strategy of opening of decisional arenas to the opposition, may be adopted because the economy offers room for manoeuvre - for instance, salaries can be raised because of a favourable position in international markets. The financial surplus can be used to satisfy the stronger strata of the working class through concessions bargained for at collective or individual level. A successful economy - as observed by Sombart (1976/1906) in relation to industrial workers in the United States - gives the working class stronger bargaining power in conditions of scarcity of labour, increasing salaries, giving better opportunities for private and societal savings and imposing more limits on exploitation, i.e. a sort of "spontaneous" welfare comes into existence. Spontaneous private welfare also covers the most privileged part of the working class. It is the "exclusive" character of both political and social rights to characterise negatively the conservative societal models.

3) Level of International Conflict.

The acceptance of different parties, factions and interests, which is essential to the indirect strategy of political integration and societal political representation, is possible when there is no serious external conflict that makes it necessary to subordinate group interests or internal divides to the national interest. This is the case of countries or historical phases¹⁶ where the myth of unity or national strength prevails over social belonging, but where social belongings and divides do not challenge the bonds of loyalty towards the state. Such countries have found institutional arrangements of a pluralist type provide a solution to civil, religious and regional wars, before class fights arise. In these situations it is not necessary to reinforce public loyalty through uniform citizenship rights. But again we find the variable of the geopolitical situation: as an island, the security of its frontiers against even strong neighbours was important for Great Britain, just as for Germany the uncertainty and vulnerability of its own frontiers to strong and aggressive neighbours was an important factor. Britain was already a great colonial power, and its domination had been increasingly consolidated during the liberal period. What is more, the theatre of battle was far away and did not affect the population directly.

4) Breadth and Power of Dominant Coalitions

The coalitions which hold the decision-making arenas are wide enough (in terms of control of resources) and have sufficient authority (in terms of legitimisation) to afford a strategy of co-option of the elite of emerging social groups. In these conditions it was possible to set up a relatively pluralist institutional framework. Nevertheless, the consensual co-option mechanism weakened the impact of the working class organisations, so social relations and hierarchies were not drastically transformed. "Great Britain was perhaps able to do something new, but always in the same old way" (Ashford, 1986, 63). The conservative connotation applies obviously only to the liberal phase, but the recent Thatcher period and Mr. Blair's "friendly to capital" socialism could indicate a tendency of the pendulum to go back to the original position of societal conservative when allowed to.

¹⁶ I am referring to historical phases, because Great Britain was involved in both European and World Wars, and underwent an economic and colonial challenge in the 1880s that justified Chamberlain's request for a "new empire" that was protectionist and generous in terms of social citizenship for English workers.

5) Culture of ruling élite and conception of citizenship.

In this type of system we find a political culture which legitimates the consent of civil society as the only source of power. As Locke stated (1948/II ed. 1690, 212) in *The Two Treaties of Government*, "by the consent and appointment of the people, without which no one man, or number of men among them, can have authority of making laws that shall be binding for the rest". As civil society cannot be but pluralistic, it is a political system which accepts pluralism and the distribution of power existing at the civil society level, hosting this pluralism and distribution of power within the political bodies. But it expects from those who want to be citizens to demonstrate their ability as private individuals. The liberal Constant wrote: "In our societies the birth in the country and the maturity of age are not enough to confer to men the typical qualities needed to practice political rights. Those who are kept by misery in a continuous dependence and condemned to everyday labour are not more enlightened than children about public affairs, nor more interested than foreigners in a national prosperity whose elements they do not know and whose advantages they enjoy only indirectly" (Constant, 1970a/I ed. 1818, 100). We have already pointed out however that the chance to demonstrate ability and independence, which entitled people to full access to citizenship were *legally* denied to women, and *concretely* denied to the poor, for whom no public intervention was organised to emancipate them materially and culturally. Society is also made up of inadequate and unsuccessful people, were kept away from citizenship. The same tolerance towards religious minorities, introduced in Britain before elsewhere (with the *Indulge Act* of 1698) was reserved for deserving denominations, and until 1824, following Milton and Locke's advice, did not include the Catholic and Hebrew minorities, as they were guilty for not prizing enough the individual spiritual freedom that produces good citizens. The same judgement of inadequacy applied to foreign civil societies justified the colonial government which recognised local authorities only if they accept dependent political status (Segatori, 1996).

In this political culture, civil society nourishes the state, and civil society spontaneously produces its own elite. By contrast, a statist culture perceives the artificial and arbitrary nature of the social order and proposes to amend it through public rationality. In its emancipating version, the destruction of the artificial political and social order is thought to enable the human race to reacquire its profound nature (consider Rousseau or Marx). Societal culture, on the other hand, fears far-ranging rational intervention, believing in spontaneity, to the extent - as in the British case - of not having a written constitution, but basing the rules of government on customs and convention in order to leave space for rights derived from the stratification over time of interpretations and sentences of the authorities (*common law*). Great Britain does not have a real

legal conception of citizenship, intended as the belonging of a citizen endowed with inalienable rights to a State which has jurisdiction over a territory. In the past, the relationship between people and political power was not related to the territory and state, but was a relationship firstly between the subject and the Crown, and then between the subject and the Parliament. Those relationships were very different. Modern judicial citizenship, intended as a uniform legal status, was introduced only in very recent times as a reaction to immigration (Layton-Henry, 1992; Juss, 1993; Dummett, 1997) and is distinguished more by the denial of rights to aliens than as an instrument for establishing citizens' rights. Paradoxically, some categories of subjects, defined by the 1981 Law, enjoy the status of citizen - British Nationals Overseas, Residents in British Dependent Territories - but are denied the right to enter Britain and reside in the national territory. To these people, as to British Subjects deprived of citizenship status, the right to vote is granted once they are allowed to enter and reside in Britain. The British differentiation of rights is extreme, because it affects even the status of citizen.

In the conservative societal model, the State does not create citizens nor treat them as equals, but simply registers -in its public rhetoric - existing diversities. Civil society spontaneously produces a well balanced equilibrium of powers, the State must just accept it: its direct role is minimum. The same logic presides over the ruling of colonies: here again the government rules indirectly, delegates at least a share of its duties to local powers: this is the *Indirect Rule* theorised by Lord Lugart. The very origins of the British Empire, as those of another conservative societal regime (the Netherlands, for instance), can be found in the economic activities of the Chartered Companies. British colonial regimes, like those of the Netherlands and Belgium (at least after the end of the personal property of the Crown) are extremely diversified, as well as relatively autonomous. In India, the states of Rajastan depended on London only for the so-called *suzerainety*, for foreign policy. They had their own armies and administration, and the government of the Crown was present only through the person of a "resident"; by contrast, the protectorates did not have armies of their own. The status of the dominions, acquired first by Canada, in 1867, consisted of being federated to the Crown, not depending on the British Government. The more the liberal principle of *responsible government* (according to which a government should respond to its subjects) became established, the more the status of dominion was extended to other countries.

Bryce (1907, 37) underlined interesting similarities between the Roman and the British Empire. Neither interfered with local religions and customs unless they raised moral conflicts; both had an increasing devolution of sovereignty and a gradual evolution towards an autonomous union under the Emperor: "the British like the Romans tolerated the local autonomies where they

found them”.

If these theses on the societal model are grounded, we should detect a decrease in the tendency to delegate sovereignty or welfare functions when the organisations involved become more radical. We should also detect a deflection away from the non intervention in the economy in the case of a loss of hegemony in international markets, and a shift towards statist characters in the case of war. Even without a systematic empirical survey, the British case would seem to give some evidence to support our hypothesis. Welfare management was put under state control only when it risked getting into radical hands. There was a shift towards a statist attitude after the rise of the German and US economies and the comparative deceleration of Great Britain *in primis* (Leon 1980, I, vol.IV, 118ss). The First World War fostered, also in societal Britain, the public care of citizens' health and the setting up of kindergartens relieved working women, needed for war production, of the care of small children (McNeill 1984, 272-275). The Beveridge plan, which introduced a national social security system for all citizens, was planned and announced at the end of the Second World War. Similar evidence from communitarian societal systems (Belgium, Holland, Switzerland) indicates that in wartime these become more statist, shifting towards a less delegated and more equal system of welfare.

But where does Italy stand in relation to the two conservative models? The initial societal culture (Marucco 1980) and the relations between State and Church, with alternating head on fights and reciprocal admissions of weakness gave way to partial delegation of social security, contrasted by recurrent waves of expropriation. Nevertheless, for welfare state building, the Italian liberal State not only lacked a coherent culture, but also the necessary administrative and fiscal structure. Societal projects were abandoned because the context was inadequate, but a real statist project was never fully adopted either, partly because it was incoherent with the dominant ideological values of the regime, and partly because of structural deficiencies. Fascism adopted a clearly authoritarian version of the conservative statist model: civil society organisations were not only bypassed and sometimes temporarily repressed, as had happened in the authoritarian phases of the Liberal regime, but organisations generated from civil societies were destroyed and replaced by artificial ones create from above. This is the core of the corporative authoritarian model (Aquarone 1965, Fisichella 1976, Tranfaglia 1973). In this model, admission to social security is made dependent on loyalty to the regime. Even the status of citizen was linked to one's political beliefs and could be withdrawn for reasons of public order. In authoritarian regimes, the relationship between rights and loyalty is explicit and absolute, showing how the truth of a democracy depends on the fact that its rights are independent from opinions and political belongings, that they are blind to the loyalty of the users.

The Fascist regime in Italy left an important part of the management of welfare and education to the Catholic Church, because of a compromise between State and Church, and the consequent formal loyalty of the Church to the regime. But devolution did not affect politically crucial functions, such as political socialisation. The autonomy of young people's Catholic associations, due to their potential for dissent as a sphere of socialisation, became one of the reasons for the conflict between political and religious hierarchies. The Fascist regime emerged in Italy after the failure of the attempt at direct integration made by Francesco Crispi at the end of the 19th century. Crispi had also introduced some elements of a welfare system, but this was very limited because it depended on limited financial means. Giovanni Giolitti at the beginning of the 20th century and before the first World War also tried a strategy of indirect integration and introduced further elements of welfare, bargaining with the socialist opposition. The Fascist direct authoritarian integration made an exception (an exception for authoritarian regimes, not for fascist ones), granting indirect integration towards Catholic organisations. Attitudes towards left wing organisations remained repressive. Even the extreme statist model in Italy does not have a coherent profile. As we have already said, there were large areas of delegation in welfare and education to the Catholic church, and an official treaty, the *Concordato*, was signed with the Church in 1929 to formalise this "conciliation". The conciliatory attitude of Fascism towards the Catholic Church also involved certain political and social values. The political and social doctrine of Church and fascism had important links and common points as far as the form of desirable social assets and the formulation of public policies were concerned: corporatism, ruralism, the subordinate role of woman, the central place of the family, for instance. The extreme statism of political rights (no pluralism and no incidence) did not go hand in hand with full statism in social rights. The Fascist welfare model followed a strategy of sub-ordered, partial and controlled delegation, and reproduced and reinforced hierarchies and social differences in line with the corporate model. This model, partially born before the birth of the authoritarian regimes, was destined to survive partially both in Italy and in Germany.

In Italy, the societal model did not work in the genetic phase, because of lack of support, especially in the South, and because workers' and religious organisations were not loyal to the regime. However, the strength of the Catholic Church made excessive change and radical movements in the statist sense impracticable (in the liberal period) and prevented a coherent application of extreme statism (in the Fascist period).

In Italy therefore statism remained weak. After the fall of Fascism, the Catholic party, the Christian Democrats, took a dominant position in the decision-making bodies, but came up against a strong and hostile opposition.

This explains the constant conflicts between the majority and opposition, which concern the societal delegation and structures close to the majority - for example, the financing of the largely Catholic private schools. The situation produced a weak statist party-centred type of citizenship¹⁷. Parties in government managed welfare with a patronage system in order to increase their own consensus. In the sharing out of power, even the opposition parties were included, although in a subordinate way, through representation in management bodies and the presence of unions (both linked to political groups in the majority and opposition) in offices and organisms responsible for assigning indemnity and for the formation of employment lists. The imbalance in the management of welfare was mirrored by a balance in public decision-making. The electoral system was highly proportional, and an important decisional role was entrusted to Parliament, especially Parliamentary commissions, where the opposition was also represented. This system broke down after the fall of the Berlin Wall, giving a definitive blow to the anti-democratic temptations of the Italian opposition. It was followed by a "conversion" to democracy of both the Communist party (the largest in Europe) and the post-Fascist party. Weakened in their function as "bastions of democracy", the majority parties were overwhelmed by the movement against corruption taken by the magistrates. This revealed the imbalance between majority and opposition in relation to illegal behaviour, such as the bribes obtained by firms for the assignment of public contracts. It led to the conviction that an alternation of opposition and majority in Government could limit the propensity to share out resources and that this could be made possible by modifying the electoral system to a majority system. The political class was obliged to change the law under pressure from public opinion which forced a referendum to abrogate the proportional nature of the previous electoral law for election to the Senate. Given the critical role of the small Catholic parties, born from the ashes of the Christian Democrats, in deciding the victory of the moderate and progressive cartels, the electoral law was constructed in such a way as to allow their survival. The fall of the old parties of government left room for two new actors: the Northern League, a party which upheld the interests of the Northern regions with successionist tendencies, and *Forza Italia*, a party led by Silvio Berlusconi, the owner of three television networks and under investigation for corruption. This new double anomaly justified continuous switching from one line-up to another: the League "discovered" it was allied with a dangerous person, the leader of *Forza Italia*, and caused the government to fall. Ex-fascists and ex-communists in the two opposite electoral cartels and in the alternate government formations justified the intermittent radicalisation of the conflict between majority and opposition. What followed was a division which, with respect to the past, alternated more

¹⁷ On the particular role of the parties in the Italian social system see Ferrera (1984) and Ascoli (1984).

within the majority of the moment than between majority and opposition, right and centre left. The majority however does not alternate in Westminster style ("everything for one") nor according to the consociative model ("always a little for everyone"). Majorities which split and recomposed tend to reconstruct the "monopolistic coalition" of the centre (Farneti 1980, Salvadori 1990) which had characterised the political system from Italian unity until the crisis of the nineties. A system conceived as bipolar and based on alternation in government is in fact reproducing old "transformism" mechanisms (people elected in one cartel move to the opposing cartel once elected).

Emancipatory Models

The Statist Emancipatory Model.

Up to now we have focused our attention more on the internal élite - those already in power - and their strategies to incorporate or neutralise the external élite. Now we switch our focus to the external élite and their strategies of violent conquest or pacific entry into power.

In the conservative cases, the internal élite follows strategies of *direct or indirect incorporation* of the masses mobilised by modernisation processes. They can either rely upon existing social organisations (unions, churches, societies) or can try to repress them and face the masses directly by granting (empty) political rights and social provisions, and providing alternative organisations controlled by the state. Similarly, external élites that lead the game in the emancipating models can follow two different strategies. Through *indirect conquest or entry* they virtually accept the existing rules of the game and are prepared to share at least part of the power with the old élite. The indirect, mediated strategy, whether emancipatory or conservative, needs in fact to be accepted by all the main actors. If just one actor raises the level of conflict, the strategy is likely to turn into a form of direct incorporation or conquest, and the case switches to a statist one. Disloyal organisations must be dismantled and replaced with forms of centralised government or with new loyal structures. "Before 1789, the French State like many others, used to govern indirectly at local level, using its priests and its noblemen to mediate (...). Parisian rebels had to face the difficulties of governing without mediators; they tried with the committees and the militia appeared after the 1789 revolutions, but it was hard to control them from the centre. Thus, more or less at the same time, they redesigned on the administrative map of the country, a network of departments, districts, cantons and communes. And they sent government commissioners to promote the revolutionary organisation on spot. They established the direct government" (Tilly 1990, 108-9).

None of the models illustrated in the previous section aimed to subvert the social hierarchies. By contrast, the intention of the *emancipatory models* is to modify and even subvert class relations in order to free new social strata or disadvantaged groups. In France, for the first time, a coalition that included lower classes was established in government. Old élites were withdrawn and the new ones changed the rules of the game to their advantage.

In the strategy of direct conquest, typical of the statist systems, social strata previously excluded or quasi-excluded come to the control decision-making arenas; they are not simply co-opted by the internal elite. The statist conservative model implies repression of external emerging élite, whereas the statist emancipating model implies repression of old internal élite. More generally, the statist model, though it claims to represent the people and to be "democratic" even in its 20th century versions, excludes or even suppresses large parts of civil society and many political actors, i.e. those social and political groups who do not happen to agree with the regime or to fit its criteria of social decency.

In revolutionary France, the rules of the game were subverted and fixed into written constitutions aimed to draw a breaking line with the past. They included a broad extension of the right to vote (universal male suffrage), but this was limited to people loyal to the revolution¹⁸. The new regime excluded traitors not only from the vote, but from the right of being citizens, and even the right of being alive.

In fact, the conflict in the country was so deep and extensive that only a minority of those entitled to vote actually did so. Many who did not identify themselves with the regime, the apathetic and diffident citizens that the revolution did not dare to mobilise, simply abstained. In 1792, the Convention that was supposed to be elected by universal suffrage (the number entitled to vote was seven million) was in fact voted by seven hundred thousand people. The link between loyalty and citizenship is dramatically unmasked here, as in all the 20th century's authoritarian versions of the statist model.

Some demand for homogeneity tinges any kind of citizenship, but in some cases this can reach the extreme of depriving people of their nationality, or even their lives, just because they belong to religious, social or political minorities. The universalism of these regimes means that the extension of the right to vote is only rhetorical and the pluralism and competitiveness of political rights is

¹⁸ Pierre Rosanvallon (1992) acutely observed that universal suffrage was brought more by the circumstances than by the desire of an enlightened élite. But this observation is applied to the extension of the suffrage in 1848.

low, as opposition is banned. By contrast, the impact of the vote is high. deputies are bound by compulsory mandates and their delegation can be revoked at any moment according to the "people's will". In fact, if this small intensive minority manages to survive physically and politically, it may overthrow its leaders. Or, to put it another way, certain leaders may use the formal impact of this selected group of people to get rid of their enemies. Veiled by a top-down rhetoric, these regimes practice a top down ruling. The level of incidence too is more rhetoric than practical reality.

The high impact of the vote is the other aspect of an élite which is formally responsive to the electorate. But here, as in other authoritarian regimes and parties, the trust between voters and élite is turned upside down. The electorate has to enjoy the confidence of the élite in power, the peripheries depend on the centre, the legislative on the executive.

We have defined as *rules of transmission*, those rules that transmit decisions from one political body to another. The more statist authoritarian the model of citizenship, the more public decision-making tends to be concentrated in a single, or in a small number of select bodies, e.g. the Cabinet, and then rigidly transmitted to the others. The more statist authoritarian the model of citizenship, the more unfair the *rules of translation*, i.e. the rules which allow only loyal supporters into crucial bodies. In this way, self-defining democratic citizenship can act unconstrained by people's consent. Summing up, power here is concentrated in controlled bodies and people (rules of transmission) and/or only loyal people are admitted to relevant bodies, even the electorate (rules of translation).

In the case of revolutionary France, the State had a strong hold over civil society. Revolutionary power tried to reconcile political and social democracy (Danzelot 1984) through the *ateliers de travail* (state workshops), public investment and official fixed prices.

The Jacobine Constitution (art.21) obliged the state to find a job for the able-bodied and means of survival for those who were not. In 1794, the first nucleus of a national health service was introduced: both secular and religious charities were nationalised and a national body for social security set up (Girotti 1998, 123-124). The aim of these policies was to reduce the economic uncertainty of the lowest classes, but it was an intention which was not really put in practice. Real welfare was still to come, but these provisions were *extensive* and *incisive* for the times. However, the provisions concerned those urban working classes whose consent was crucial for the revolution, so even the extension was more formal than substantial.

In social rights, as in political ones, *universalism* was paradoxically partisan. Embryonic welfare showed manipulative and coercive features. We can judge the pluralist attitudes of this regime and its consideration of social autonomy by looking at schooling. Education was first delegated to the "conforming" clergy, who were freed from obedience to the Pope. Then it was managed directly by the revolutionary state which prized it as a crucial instrument for transmitting republican values. The attempt to create a new culture reached its zenith with the invention of a state religion. In this context, the prohibition of trade unions (Law *La Chapelier*, June 14, 1791) cannot simply be considered an application of those free-market principles dear to the emerging bourgeoisie (like the British anti-combination Laws). It was, in fact, accompanied by the introduction of compulsory employment cards which were a clear public order measure (Salvadori 1990, II). Summing up, the *plurality* and *autonomy* of social rights were quite low.

The tendency of this model to contrast both to social privileges and social freedom is immense, and shows the risks of an over-statist citizenship, which deprives its members of customs, identity, belonging and resources.

Let us single out now the factors which can influence the rise of an emancipatory statist model of citizenship.

1) Level and Form of Domestic Political Conflict.

At the beginning of any revolution, the conflict is, by definition, at its maximum, but it remains high and complex for a long time. I say "complex" because in France, alongside with the classical conflicts of religion and class, were the institutional conflict (monarchy or republic) and the dynastic conflict (which family?).

2) Level of Economical Competition.

Here we find countries of the second wave of industrialisation, such as France, where state intervention was necessary to permit take off and to protect national economy. In this particular case, France already had a strong tradition of state intervention in economy, such as in the mercantilist period.

3) Level of International Conflict.

This is initially high: the overturning of social relations in one country causes strong international reactions which are fanned by the desire to extend and export the republican model.

4) Width and Power of Dominant Coalitions.

The winning coalition was both limited and radical. The core consisted of the intellectual lower bourgeoisie, artisans and the urban industrial classes - aristocracy, clergy and farmers were excluded. It was a coalition of emerging classes, which gave the model its emancipating feature, but the narrowness of the winning coalition and the strength of the opposition gave the model its statist features.

5) Culture of Ruling Elite and Conception of Citizenship.

In authoritarian regimes, even the (pseudo) emancipatory ones, the boundary between foreigner and citizen is mobile and arbitrary. In 1789 Sieyes suggested expelling from the nation the privileged classes and all those that the red revolutions would come to call "class enemies". Citizenship could be lost if one was not a member of the social groups which took power in the Revolution, i.e. did not belong to the "right class", or if one did not accept the revolution, i.e. did not have the "right ideas". Citizenship was based on a *serment civique* (Wenden 1987, 45), a civic oath of adhesion to republican values. Tallien declared: "The only foreigners in France are the bad citizens". Consequently, the constitution of 24 June 1793, even if never applied, considered that foreigners with particular merits could be admitted to the rights of French citizenship at all levels. On 26 August 1792, French citizenship was granted to seventeen eminent foreigners, but in another phase of the revolution, some of them were arrested and executed (Brubaker, 1992, 56).

Later on the status of citizen was given to long term immigrants. In 1851, for the first time the so-called "double *jus soli*" rule was introduced, according to which foreigners born in France from a foreign parent also born in France became citizens at birth. But according to the same law, and also the current French nationality law (March 1998), foreigners can refuse French citizenship on coming of age. This opportunity of opting out was used in the past to avoid military service, but with the 1871 law, this opportunity was temporarily abolished. It was necessary to prevent foreign workers from avoiding military service, which also meant progressing better in a career as artisan and marrying better (Weil, 1997). In the early stages of this universalistic conception of the nationality law (shaped more on the *jus soli* than other European versions), there was a need to impose duties on those foreigners who enjoyed French rights. A sort of legal equality among all people resident in France was affirmed. Furthermore, apart from political rights, other rights of French citizens were also granted to foreigners. In France, citizens' rights tend to become human rights. This capacity of the rights to abstract from the condition received at birth shows an admirable universalistic aspiration, but also the pretence to abstract the

individual from his personal and social history.

The standardisation of rights, and equality in the face of the law is one of the basic values of the republic. Sieyes affirms: "I imagine the law as if it was at the centre of a great globe and all citizens, without exception, are on the surface of this globe, all of them have the same distance from the law, and are dependent on it (...) and equally protected" (Brubacker, 1992, 39-40). This anonymous citizenship, which is detached from social belongings, is very easily undermined: public power itself, which is its only guarantee, can take it away as it gave it.

The principle of legitimisation of a new élite is popular sovereignty. Because of this, the extension of the vote must include all citizens. In fact, in France, universal suffrage was used to vote the Convention of 1792, and introduced with the Constitution of 1793. Finally after the restoration and the period of liberal monarchy (which permitted a census based system), it entered constitutional framework definitively in 1848. In the same year, it was adopted in Switzerland. In both countries, however, women were excluded from voting (until 1949 in France and 1970 in Switzerland), as they were in the Republican United States. It is well known that Rousseau, the most important theoretician of the emancipating republican model, excluded women from political citizenship and, in the sphere of gender, supported the traditional system of relations. Susan Moller Okin (1979, 114-115) referring to Rousseau in *Emile* and *Nouvelle Eloise* comments that, in these texts, the philosopher hopes that precise roles between genders will be restored. He prizes women's ignorance and their subjection to men, and claims that the preservation of traditional rules in private life are necessary for re-establishing family morality on which the new republican morality can be based. In *Le contract social* he observes that "the most ancient and the only natural society is the family" and within the family, the subjection of the wife is essential for two reasons: the need for a prevailing authority in the case of disagreement, the impossibility of assigning this authority to a person frequently distracted because of pregnancies, and finally the need for men to count on a sure descent. The subjection of the woman is not, as we see here, a forgotten feature of the past, a prudential oblivion in the process of innovation, it is, on the contrary, seen as a constitutive element of the democratic morality. Gender hierarchical relations must be considered an important feature of the democratic model and one of its major limits (Held, 1987, cap. III ; Elshtain, 1981; Pateman, 1988, 1989).

In line with this model, the doctrine of "republican maternity" was essential to the construction of young democracy in the United States (Kerber, 1980). Removed from the roughness and partiality of the political fight, the republican mother could dedicate all her time and energy to raising and

educating her children and future (male) citizens, offering a moral example to her husband. This ideology made it possible to consider a very private function (the education of children, and physical and psychological care of the husband) as a public function (transmission and preservation of the republican morality) (McDonagh, 1991). Democratic citizenship excluded women because their place at home was necessary to sustain republican morality; the fullness of male citizenship implied the exclusion of females. The democratic love for ancient virtues is expressed by attempting to reproduce the social organisation where they first flourished: as in Athens, the *methecs* in charge of organising material life enabled citizens to devote themselves fully to public life. In the same way, French and American women who were assigned to family care, enabled the citizens of the new republics not only to look after their businesses, but also politics. Ursula Vogel (1991) correctly observes that the exclusion from the political community is a constitutive element of the regime. Democratic citizenship is shaped to fit men's needs and value; it is a manly citizenship.

In fact, the right to vote is made dependent on the capacity and availability to defend the country, or having served in the army. But this is a civic duty to which only men by law are admitted. Quite cleverly, French revolutionary women, the so-called *tricoteuses*, asked the Legislative Assembly as a priority to permit the forming of a feminine civic guard, because they understood that military service was a basic requirement to accede to citizenship rights. Their request was obviously rejected.

The same motivations were used in the States by the democrats to exclude the Afro-American minority from political citizenship. In connection with the American Revolution Shklar observes (1991, 51): "Winning republicans refused wealth as a sign of virtue, and they immediately took race instead. The soldier-citizens of New York thought the Afro-American should not have the right to vote, because they did hadn't deserved it as members of the civic guard. When someone pointed out that it was the guard that did not admit blacks, the argument was considered insufficient".

In any case, emancipating models are more generous towards ethnic minorities and colonies, than towards women. At the beginning of the revolutionary period (1789-93), the constitutional assembly introduced local assemblies in the colonies with the Act of 28 March 1790. The first legislative assembly granted political rights to all free men. The Convention voted the abolition of trade in men and slavery, making all men both free and voters. The constitutional assembly declared the colonies to be a part of national territory, but voted not to include these areas under the jurisdiction of a constitution voted for the mainland, and decided not to subject the colonies to laws which would be not compatible with the local customs and needs (Mauro, 1977, 175-176). With

the reintroduction of the republic in 1848, slavery was definitively abolished, and French citizenship was granted legally to the inhabitants of the colonies (West Indies, Reunion, the Four Territories and Senegal). Algeria, at that time, was not a metropolitan territory nor a colony, it was under the direct control of the army. Local assemblies gave the colonies a relatively autonomous status, but this status was not extended to other conquests, and was in any case reformed by an Imperial Senate Act in 1854, that decided the colonies should be ruled by imperial decree, i.e. directly from the centre. In other words, the model of *direct integration* was applied, in modified form, also to the colonies. This situation continued till 1949, even though in moderated form and with the substitution of governmental decrees for imperial acts. An exception was made for the Territories cited above, which had already received a special status. The Fourth Republic went back to 1848 rules and traditions and, through a series of acts which ended with the law of 7 May 1946, direct integration assumed a democratic form. Under this law, all inhabitants of overseas French territories became citizens without distinctions of civic and personal legal status. The Empire became the French Union. In 1956, two years before their independence, the electorate in the former colonies was more or less one third of the metropolitan one: but there were only 33 representatives of North Africa (Delavignette, 1982).

In this model, the cultural attitude is based on the assumption that social relations and assets are constraining and false constructions which have to be dismantled and rebuilt by the moral action of the law. The law is an act of will, the expression of the collective will and is inspired by principles of equity. It is not the outcome of a spontaneous process, nor the result of a compromise between many actors. The general will of Rousseau is contrary to the will of a few privileged people, but it is not plural. The individual is given back his natural right to equality, but no right to diversity is foreseen. In the happy spontaneity of the natural state, which Rousseau wanted others to share, there could be gender differences, but not differences of opinion. This subversion applied to some social relations and not to others (to class privileges, for instance, but not to gender privileges), it was illiberal and anti-pluralist (it could not accept the principle there can be many different ways - equally deserving respect - of interpreting the common good)¹⁹.

So, just as the conservative statist model can be considered a prototype of the right wing totalitarianism of the 20th century, the emancipating model was a forerunner of left wing totalitarianism. Both models enable us to understand the risks of an excessive supremacy of the state over civil society.

¹⁹ David Held (1989) defines this democracy model, in cultural terms as a *democracy of development* and he too observes that women were excluded.

The Societal Emancipatory Model

The fourth model and path to citizenship is the societal emancipatory one. In fact it is the first modern model and the only one to survive, at least partially, today. We adopt as a prototype of this fourth kind of citizenship the Scandinavian case, and in particular the example of Sweden between the 1920s and 1930s.

It may seem a big leap forward to modernity to deal with the Scandinavian cases, but in many respects they can be considered latecomers. In the previous cases we have examined the rights of citizenship at their outset, when they were addressed to individuals, or were extended to the lower classes. In Sweden, representation by estates persisted until 1866 but, as in Norway and Finland, representatives of the Fourth Estate already sat on the Diet. This helps explain the greater familiarity of Scandinavian working classes with political dignity. Nevertheless, universal suffrage based on the individual vote was introduced only in 1907 (the plural vote lasted till 1918) and the Cabinet became responsible to Parliament only in 1917. We should note that the extension of suffrage did not come at the same time in all Scandinavian countries. "During the period between 1850 and 1900, Denmark had the most generous extension of suffrage among the four Scandinavian countries" (Kuhnle 1975, 25). In 1872, only 2.2 percent of the adult male population in Sweden was entitled to vote (Kuhnle 1975, 18). Romanelli (1979, 443) considered the overall percentage of voters in Sweden very low when compared with contemporary European countries. In 1878, the percentage of voters in Sweden was exceeded not only by countries with universal or wide suffrage (in 1877 France had 26.9 %, in 1878 Germany 20 %, and in 1873 Denmark 15.46 %), but also by gradualist countries. For instance, 8.8 % of the population in Great Britain in 1880 had the right to vote.

All things considered, the model is not a pioneering one as far as modern citizenship rights are concerned. It does, however, have certain exceptional features, like the high early level of literacy and political representation of farmers. But in Sweden there was no precocity in individual political rights (either in *extension* or in *incidence*) and even social rights did not come early. The first voluntary health insurance scheme, poorly funded by the state, started in 1891. Work accident insurance, also covered by a low level of public funding, was introduced in 1901. At the beginning of this century, Liberals and Conservatives of the various Scandinavian countries still accepted the classic British distinction between the deserving and undeserving poor - the former to be helped, the latter considered a danger to the public order (Kuhnle 1978).

The long wave of free market oriented, restrictive social policies arrived in Sweden from Britain, which had significant commercial trade and cultural contacts with Sweden. These policies arrived quite late however. A repressive *Poor Law* was introduced in 1871, when in Britain it was already facing serious difficulties and criticism. It would prove quite hard to use Sweden as a virtuous model before the twenties. The same applies to Norway and Denmark which were influenced not only by Britain, but also (and sometimes more) by Germany. Scandinavian countries in the first decade of the century remained not only backward, but extremely diversified. In some respects, they remained very different until after the Second World War and, if we include Finland, until the fifties. Nevertheless, some features of the societal emancipating model that still characterises to some extent the Nordic area were beginning to emerge in the 20s and 30s. Let us now have a look at them.

The indirect rise to power, typical of societal strategies operating from below, implies at least a temporary cohabitation of the new élite with the ideologically most similar part of the old élite. There is a transition period in which the previous external élite, parties that represent previously excluded certain social strata, sit in a coalition government together with the previous internal élite. In Scandinavia the Fourth Estate's parties came into power earlier than elsewhere. There was a short lag between party foundation, electoral success and entry into government. This early access to decision-making arenas reinforced the reformist features of working class organisations. Decisions had to be taken and bargaining was necessary with other élites, new parties had to be able to gain and keep electoral consent and prove effective. When working class parties came to power, suffrage was already universal and this forced them to perform well in order to gain consent in a large competitive electoral market. The regime was a parliamentary one and this implied bargaining and dealing.

In Sweden, the Social Democracy party was founded in 1889 and had an excellent electoral performance after universal male suffrage was introduced in 1907. It entered the government, sharing power with the Liberals in 1917, then ruled alone in 1920, between 1921-1922, between 1924-1926 and then uninterruptedly from 1932 to 1976. It came back to government in 1982 and then started a period of alternation in and out of government that has lasted to the present day.

The rules of the game were changed smoothly in Sweden. In fact, the continuation of the monarchy was not questioned and has never been seriously put in doubt. Cohabitation was political (between competing parties), institutional (between Crown and Parliament) and organisational (between classes within the same party). The foundation of working class parties was the result of a green-red social coalition: country people (both smallholders and

renters) and urban working people. This strong social coalition was able to organise itself, come into power and make good use of the state, allowing the emergence of an attractive model of citizenship.

Political rights enjoy an high degree of extension and equality. The Scandinavian countries have retained proportional systems, rather than systems that are more "expressive and equalitarian" in representing parties and voters. Pluralism and influence of political rights also score high, though the increasing tendency to form coalition governments reduces the impact of people vote. On other dimensions of political rights Scandinavian systems have positive features that have increased over time. The delay between male and female universal suffrage was narrow in Scandinavian countries (it was granted to both genders simultaneously in Denmark and Finland). The Nordic area is the region where women were first (and increasingly) well represented in political bodies. Scandinavian countries were the first in Europe to grant a local vote to non EU immigrants.

Social rights in this model are *incisive*, strong, equal and *extended*, but are not fully standardised, since a degree of *autonomy* remained for long time (they were not always managed by the state). Despite the example of other countries, the "socialist state" did not even pretend to become an entrepreneur. Social rights were the outcome of policies which were extremely innovative for their time (Telò 1988). For instance, the reduction of unemployment was achieved by increasing public employment and spending, thus destroying the balance of payments myth, until then also believed by progressive parties and economists.

Welfare has gradually built up and allowed women to enter labour market and involve men in those domestic duties not devolved to social services. Devolution of care functions to social services has been limited by recent reforms and indicates the general crisis in which the model finds itself (Esping-Andersen 1990, Langan and Ostner 1991, Borchorst 1994, Bussemaker and van Kersberge 1994, Sainsbury 1994).

Taking some liberties, we can define this model – while it was in good health - as societal. Social security has long been managed by the unions: health insurance from 1891-1955 (in Denmark from 1892-1960, in Finland until 1963), unemployment subsidies from 1934 until the present (in Denmark since 1907 and in Finland since 1917, and in Norway from 1906 to 1958). Retirement funds were managed by the unions from 1913 (in Denmark 1891, in Norway 1936, and in Finland 1937) up to the introduction of National Retirement Programmes, but supplementary pensions are still managed by the Unions (Flora 1991). The private school (*friskoler*) financially supported by the state is the main educational provider in Denmark. The amount of public expenditure, the

extension, relevance and redistribution capacity of Scandinavian social rights give this model an emancipating dimension, while the indirect management of the welfare give it a societal character. Social rights are strong, equal and extended but not standardised, as is confirmed by the renewed attitude to respect their pluralism and culturalism in the face of immigration (Soysal 1994).

We can begin to see that huge public expenditure is not sufficient to give the model statist features. Similarly, corporate representation based on interests or on ethnicity recognised by the state does not say much about the nature of a regime, and is not enough to distinguish between authoritarian and liberal corporatism, between fascist and social-democratic corporatism. There are strong differences also between democratic regimes as far as relations between state and organised interests are concerned (Lembruch, 1979). The associational subsystem and organised social interests in Sweden have greater independence compared to Germany²⁰. In Germany corporatism is promoted by the State and embedded in a public law network. This is the result not only of a persistent feudal imprint, but also of American intervention in drawing up the constitution (the US was concerned to avoid the disruptive fragmentation and social conflicts that had characterised the Weimar Republic). By contrast, bargaining practices in Sweden were first introduced at social level and then registered by the state. Statist and societal types of corporatism allow us - as Schmitter (1983) has suggested - to distinguish not only between democratic and authoritarian regimes, but also within democratic regimes.

A particular form of corporatism confirms our thesis about the traditional societal character of the Swedish model, and so does the party organisation, which was for long time indirect, based on unions and leagues, as in the British case.

Let us now see how the rise of this model is influenced by our variables.

1) Level and Form of Domestic Political Conflict.

The "revolution in two phases" planned by the social-democrats when translated into practice becomes reformism. As we have already seen, the internal organisation of the party is indirect; it is made up of parliamentary groups and trade unions. This form of organisation reinforces the societal syndrome, since it makes the party management depend both on workers' associations and the electors' vote. At the same time, it reinforces the social democratic tendency to reformism, because the representatives of trade unions and the members of

²⁰ So I do not agree with authors like Turner (1992) who see in German citizenship a strong societal character.

parliament are obliged to solve problems, bargain and reach compromises. By contrast, organisations based on party sections, direct enrolments or a sort of ideological exam for membership acceptance tend to select members who share the same non negotiable values. The indirect party, made up of leagues and societies of workers, is built on organisations and people that share not only values, but also economic interests and needs and has aims that can be negotiated.

As in all Protestant countries, the conflict was simplified in the past by the repression of the Catholic Church, which was substituted by churches more loyal to the political regime. To use the expression of Henrik Stenius, the Lutheran Church and the State in Scandinavian countries are "two parts of the same body". We find that the societal regimes are viable in political regions which have been pacified in the past, sometimes by force. It is possible to set civil society free because it does not host any dangerous antagonist. In Sweden, the level of the conflict was low also because one of the traditional adversaries of the emancipation of the fourth state, the agrarian aristocracy, was weakened by the action of the Crown before the citizenship-building process began. In Northern Sweden, as well as in Norway and Finland, there was no feudal system. In this country, a preferential relationship between Monarch and population was created to counterbalance the aristocracy. This was achieved by having the "fourth state" represented in the Diet at an early stage, which gave a good start to the emancipating dimension of this societal system.

Furthermore, in the case of Sweden, the extension of suffrage preceded industrial take off. This meant that for working class parties to receive sufficient electoral consent to be able to enter public decision-making arenas, they were obliged to form an alliance between industrial and country workers. The alliance was based on the combined effort to achieve compatible goals: full employment for industrial workers and price protection and lightening of debts in agriculture. By contrast, the potential conservative front was divided, with the industrial bourgeoisie on one side and the large landowners on the other. Workers were also able reach an agreement with their counterpart, the industrial entrepreneurs (full employment in exchange for public funding and public protection for national industry).

But the emancipating societal model has to make some use of statist tools and the State itself to overcome the resistance of the advantaged classes in order to achieve its egalitarian goals. Since these include the elimination of privilege, and hence the elimination of the opposition as a social subject, even if pacifically, this can lead to cyclical waves of radicalism which increase the degree of internal conflict. *The emancipating societal type is therefore a sort of link between societal and statist models.* If the societal models of citizenship can

be permitted by political coalitions that are already strong (at the level of civil society), a wide coalition made up of the weaker classes is a kind of intermediate situation. There must be public intervention to reach the main emancipating goals of redistribution of wealth, roles and social dignity.

2) Level of Economical Competition.

When this citizenship model emerged, Scandinavian economies depended on exports, but the core sectors were fairly competitive in the international market. State intervention was necessary, but private firms were strong enough to benefit from of a compromise with the state: the increase in social contributions ended up as an advantage for the biggest firms, since it put many small enterprises out of business, increasing the degree of concentration. The heavy state intervention in the economy that characterised the social-democratic period in the thirties was a response to the recession. Social democrats come to power in a moment of great international competition, a condition that reinforced the need to make use of state intervention and obliged this model to adopt some statist features.

However, the key reason for the shift towards the statist area was the one already mentioned: the fourth estate needed to use public power to gain and keep positions, since though numerous, it was not strong enough in civil society. Nevertheless, I prefer to define the system societal, because of the balance of powers and agreements reached at the level of civil society (because politics is not emancipated from society), and the fact that parts of welfare management were left for long time to workers organisations.

3) Level of International Conflict.

These systems may have had an imperialist and warring past, as in the Swedish case, but at the time we observe the rise of the model (at the beginning of the 20th century), they were characterised by a lasting period of peace (Alestalo and Kunhle 1987). Sweden and Denmark are two of the most ancient nation-states in Europe, and the rise of citizenship did not coincide with nation building or a time of war. The long established condition of the nation-state reduced the importance of national unity and left room for a political culture which accepted organised interests. (Titmuss 1958, Weir and Skocpol 1989). On the other hand, Norway and Finland faced a very different situation, being alternately subject to invasions and successful secessions.

4) Width and Power of Dominant Coalitions.

The winning coalition was broad and composed of new actors, but this did not mean the old ones were eliminated (even though it affected their social resources

and legitimisation). The industrial working class was not concentrated in big cities, and found agreement with the country workers relatively easily. The early Lutheran dominance gave the underprivileged classes a tradition of literacy, reinforced by early intervention of the state in the field of public education (In Denmark officially in 1739, but effectively 1814, in Norway 1827, Sweden 1842 and Finland 1866)²¹. The disadvantaged classes underwent a process of emancipation in civil society, (literacy, small scale land ownership, etc.) before they were allowed into political arenas, as for the societal models. But, unlike the conservative model, the ruling and wealthy classes were more fragmented (due to the divisions caused by the non-Lutheran sects) than the less wealthy classes pressing to enter power (Flora 1991). Nevertheless, considering that the resources of the new actors were their organisation and ability to use the state, this model cannot be fully placed in the societal category.

The specific feature of the Scandinavian model is not only its liberal and societal character, but its emancipatory nature, due to the preponderance of the labour component and the consequent incorporation of the classical goals of the organised working class (low competition within the working force, low salary differentiation, low control on productivity, high salaries and high social rights). But these goals can be reached only in periods of economical growth, so the system can hold only if the most important industrial sectors are not submitted to strong international and if the quality, education level and skills of the workforce counterbalance the high cost of labour. If competition in the key sectors becomes stronger, and if the quality differential between national human capital and that of rival economies decreases, the system loses points.

Many scholars have started to underline the negative features of a model they used to consider as optimal. Paci (1990b), for example, though still sympathetic, thinks this model cannot reconcile democracy in both the economy and politics. It seems to me that the Swedish case, and the entire Scandinavian area, share a European problem. It is becoming increasingly difficult to combine *citizenship and efficiency*, diffusion and strength of social rights, the draining of public economic resources, capital accumulation and economic competitiveness in a context of rising international economic competition. In the face of increased international economic competition, it is difficult to maintain the necessary class solidarity among workers from whom very different levels of productivity are demanded in public services and private industry.

²¹ Kuhnle (1975, 48) has observed that, as always in education, this data has to be interpreted with caution: one thing is a claim by the State to impose education, another is to have the financial and coercitive capability to do it.

5) Culture of ruling élite and conception of citizenship.

In this period, the external and internal élites shared the principle that power is legitimate when it is the expression of popular sovereignty, which implies universal suffrage. The Scandinavian countries have a very different history in the timing of extension of the vote - in Denmark there has been universal suffrage for the male population since 1849, in Norway since 1897, and in Sweden 1907. As we have already said, when citizenship rights were first introduced, Denmark was still more influenced by the statist-Bismarkian model, and Sweden by the Anglo-societarian model, but a common feature of the Nordic countries was the early political involvement and democratisation of the country workers. Women's suffrage came relatively early, also because women "at risk of conservatism" were more easily controlled here by progressivist agents.

In these countries, the conception of citizenship and nationhood is "upside down", as national identity sprang from democratic identity. The recent Scandinavian perplexities about joining the European Union and the victory of the "No" vote in Norway were fuelled by the fear that social rights (already impaired by economic crisis) and the parity between genders could deteriorate through association with regimes which are far less advanced in the field of emancipating citizenship rights. Diffidence towards the European Union is coupled with diffidence towards immigrants (Siim, 1998): pride in a model of citizenship could lead to Nordic nationalism.

As in all societal models, here too rights are the consequences of conquests and pressure from civil society. In Scandinavian cases, we find important suffragist movements. The Scandinavian "state feminism", as it was defined by Hernes (1987), is in fact a feminism which originally was societal, based on women's associations, supported by unions permeated by a universalistic culture and capable of using the state as a tool of emancipation. Even in present times the move from below and the political mobilisation of the Scandinavian women is still strong (Siim, 1998).

But in the sphere of gender parity, the Scandinavian "unlimited citizenship" risks inefficiency. Women have an almost full rate of employment (over 80%), but this has been reached through the expansion of public administration and services, where women's jobs are concentrated. The public sector can "afford" absenteeism rates of 50% per day caused by the high percentage of women with small children, but as a result has had to renounce wage parity with the more efficient private sector. Salary diversification was made possible by a union split that gave birth to two unions: one for the private sector and the other for the public sector (Esping-Andersen, 1990b; Paci, 1990c). Full employment for women has been achieved, here as everywhere, through

occupational segregation (Langan and Ostner, 1991) and by accepting lower pay rates. In fact, more discontinuous work is paid as if it were a less skilled.

Why did the Scandinavian model started to decline by the end of the seventies? According Siim, the reason is not the rise of the international competition, but must be sought within the model itself, more specifically, the fact that it turned "statist" (1998, 368) and thus lost its qualities. But the changes citizenship had to undergo, even in the Scandinavian countries, cannot be explained only in this way. The revision of the pensions system, the deregulation of the labour market, the greater freedom given to employers in the utilisation of the workforce introduced in the Nordic Area as elsewhere can provide some explanation. An economy which is very open to the exterior is more subject to the effects of international competition and the state can no longer do much to support national business.

We should perhaps put the initial question the other way round: rather than "to what extent can citizenship contrast capitalism", we could ask "to what extent can capitalism defeat citizenship"? In other words, to what extent can the transformation of the factors that Marx called "production forces" (production technologies, means of transport and communications, organisation of production and labour) transform and reduce citizenship rights? I tried to give an answer to this question in another article (Zincone, 1998a) and shall attempt to summarise the main points here.

The great reduction in costs and times of transport and communications, as well as the liberalisation of financial markets, has made it economically worthwhile to relocate certain production processes abroad, in countries where labour is cheaper, less protected and without union support. Relocation is fostered by the tough competition to obtain a share of the limited demand for products. Markets are already saturated in developed countries, and cannot expand sufficiently in the developing countries, since most of the population does not earn enough to buy durable goods. Another limit to industrial expansion is represented by ecological damage (Revelli, 1995, 1996). The competitiveness of some Western economies is declining, but the risk is high for all economies and is making it necessary to reorganise production. It has become more efficient to break up large factories into small production units, restructuring the entire production process. The new organisation makes it possible to achieve more flexible and sophisticated production, but also to give less protection to workers. A small central body remains as part of the original industry, and has the task of reorganisation, assembly and co-ordination. It acts as an operative centre, surrounded by groups of *subcontractors* each responsible for one specific task, and in competition with each other. The workers of the main firm are normally more protected than those of the subcontractors, which in turn often subcontract part of the work to even less protected workers in firms

operating in the informal economy. Competition within the national working force increases or, to be more precise, the competition within the workforce resident on the national territory increases. In the Italian case, for example, many immigrants, even those legally resident, work in the informal economy, which implies worse conditions of employment (Reyneri, 1998). Large amounts of money, moved through investment agencies, reward and favour companies and economic systems that keep the cost of labour low, use a flexible working force, and offer low welfare contributions, i.e. those companies and national economies which operate against citizenship.

From these observations a major contradiction within citizenship emerges - a puzzle with no solution. The weakest workers, such as women and children in the past, and immigrants then and now, are ready to accept the most degrading working conditions, and in this way move the competition downwards, impairing the value of citizenship. The negative impact of immigration is strongest on non-skilled national workers and in less modern sectors such as agriculture and construction. Poor Italians who migrated to the United States in the late 19th and early 20th century were stigmatised as strike breakers. It is difficult to escape from the impasse of a citizenship that has to be "closed" to the weakest groups in order to survive. A possible way out is the solution already adopted by the German trade unions after World War II towards South European "guest workers": to have them receive the same salaries and guarantees enjoyed by national workers. But today the unions are less strong than they were, and present immigrant workers less protected by their country of origin, since these states are weaker. Nowadays, downwards competition can be moved more easily to the free territory of the informal economy in many of the so-called advanced democracies. Under pressure from competition from economies with weak citizenship rights, the formal sector adopts at least in part the features of the informal one: it is more inclined to fire and hire for temporary jobs, increase flexibility of work hours, offer less welfare and lower fiscal costs. The fragile situation of the new immigrants does not only affect social rights, but also other categories of rights. In the field of civil rights, for example, they are banned from certain kinds of job, their chances of residing in the country is conditioned, and the religions they practice may enjoy a lower legal status compared with those practised by national inhabitants. If they do not possess a regular residency permit, they can be held and expelled at any time, though this is not always easily practicable. Even if immigrants have been resident in the country for long time, in many democracies they do not have the right to vote, even in local elections.

While the political strength of the workforce is reduced, because of internal competition and because immigrant workers almost everywhere are deprived of the right to vote, industrial and financial capital can move freely,

and the political weight of the fear of capital escaping abroad is immense²². As workers unions are weakened, and also the representation of underprivileged classes within social and governmental coalitions, the emancipating character of citizenship loses effectiveness. Control over the economic sphere is no longer in the hands of an individual state, whose bodies are at least partially governed by the electors, and this means that the influence of people's vote is reduced. By contrast, non elective bodies, such as the Central Banks, which are free of government and parliamentary control, are acquiring new powers. Not only supranational bodies, such as the World Central Bank or the International Monetary Fund, but also private agencies, such as Moody's or Standards and Poor's, are given the task of evaluating the financial health of firms and the trustworthiness of firms or even national economies, and determine their survival. The public action of the single state is losing importance and hence the statist features of citizenship models. Whereas citizenship completely entrusted to state intervention is undesirable, a form of citizenship deprived of public action, i.e. a citizenship with no state or other strong public agent, cannot exist. Furthermore the so-called technical bodies cited above are politically and ideologically biased, since they translate the logic of capital (its freedom of movement, the free use of the workforce and of natural resources, low contributions and taxation) in terms of their own "neutral" aims.

Finally, we can observe that the "devil's mill", the disruptive and reshaping action of the capital is not blind to prejudice. Welfare systems in the democratic countries, even though to a different extent, continue to legitimise and have more respect for the productive function than the reproductive function (Frazer 1989, Nelson 1990). Italian welfare in particular gives strong support to workers and their families (Negri and Saraceno, 1996). Reforms now in progress are trying to abandon the traditional family model, but not completely (Saraceno, 1997). Unemployment rates of male breadwinning adults in Italy are almost nonexistent when compared with other categories (Reyneri, 1996).

A modern adaptation of the conservative societal model is coming back from the past and spreading outside its traditional terrain in British territories abroad. Sometimes the model is tempered by local traditions. The general guidelines of welfare reform (Girotti, 1998, 346) can be summarised as follows: minor extension (welfare reserved for the very poor), less relevance (welfare covers extreme cases and dramatic events), it is less generous and hence more conservative, and management is delegated to civil society organisations which makes it more societal. Some of these reforms are the consequence of the costs

²² This is a condition that Pierson himself, who judged the consequences of globalisation on welfare to be unimportant (1996), considered a serious handicap (1994), able to explain the relative weakness of American welfare.

resulting from the ageing of the population (higher medical expenses, more pensions and fewer contributions)²³ and the decrease in revenue due to the high unemployment rates in many European countries. The present reform of social citizenship is also supported by an ideology which delegitimizes public action and state intervention (Hirschman, 1993).

The European Union could represent an appropriate level of public decision-making to cope with present structural and ideological turn, but unfortunately the constitution of the Union, the Treaty of Rome, makes it difficult for the Union to become an effective political agent. The European Community was conceived for the creation of a common market, and it was possible to foster the unification of the market without the need for a common political will. Since the common market was already the "law" of the Community and then of the Union, it could be enacted and implemented by simple sentences of the courts (Scharpf 1999).

By contrast, to enhance and protect European citizenship rights would require continuous and renewed consent among the member states which would be difficult to achieve. Some timid steps in this direction have already been taken, especially with the Maastricht and Amsterdam treaties. Important matters such as security and immigration have been moved from the third to the first pillar, which implies that in these fields the Union can now decide by majority. A more important role has been assigned to the European Parliament, elected by citizens, in comparison with the Council or the Commission, where the executive governments of member states are represented. The path towards the formation of a European political agent is nevertheless too slow and too uncertain in relation to the strong impact of the factors which are eroding the conquests of the emancipating models. Marshall's hypothesis, which states that citizenship is a good antidote to capitalism, could perhaps be reversed: capitalism has proved to be a good antidote to citizenship – the logic of the market is prevailing over the logic of protecting and representing underprivileged groups.

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²³ This explains the unsuccessful reduction of social expenses even after the reforms.

Table 1. Transitions Towards Citizenship: a Typology.

	STATIST	SOCIETAL
Conservatory	Type A (Bismarck's Germany)	Type B (Liberal Great Britain)
Emancipatory	Type C (Revolutionary France)	Type D (Sweden in the 1920s and 1930s)

Table 2. Models and Rights

Type A Statist – conservative			
Political rights	Extension +	Pluralism + (-)	Incidence -
Social rights	Extension +	Pluralism + Autonomy -	Incidence +
Type B Societal – conservative			
Political rights	Extension -	Pluralism +	Incidence +
Social rights	Extension -	Pluralism + Autonomy +	Incidence +
Type C Statist – emancipatory			
Political rights	Extension + (-)	Pluralism -	Incidence + (-)
Social rights	Extension +	Pluralism- Autonomy-	Incidence +
Type D Societal – emancipatory			
Political rights	Extension +	Pluralism +	Incidence +
Social rights	Extension +	Pluralism – Autonomy +	Incidence +

Key: the sign represents the positive/negative impact when the rights are respected, the sign in brackets represents the right as it is put in practice, when different from formal legislation or public rhetoric.

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